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1 Riverside, California, Monday, March 2, 2020

2 9:05 a.m.

3  
4 THE VIDEOGRAPHER: Good morning. We're  
5 going on the record at 9:05 a.m. on March 2, 2020.  
6 Please note that microphones are sensitive and make  
7 pick up whispering, private conversations and  
8 cellular interference.

9 Please silence or turn off all cell phones  
10 or place them away from the microphones as they can  
11 cause interference with the deposition audio.

12 Audio and video recording will continue to  
13 take place unless all parties agree to go off the  
14 record.

15 This is media unit one of the  
16 video-recorded deposition of Sheila Allen taken by  
17 counsel for defendant in the matter of "Haman, Inc.,  
18 dba Knights Inn versus Chubb Custom Insurance  
19 Company," filed in the United States District Court  
20 of Northern District of Alabama, Southern Division.

21 Case No -- civil action file No.  
22 2:18-CV-01534-JHE.

23 This deposition is being held at WPC  
24 Executive Services, located at 2900 Adams Street,  
25 Riverside, California.

1 My name is Tony Nokes. I'm the  
2 videographer. The court reporter is Renee Pacheco.  
3 We are here from the firm Veritext Legal Solutions.

4 I am not related to any party in this  
5 action, nor am I financially interested in the  
6 outcome.

7 Counsel and all present in the room and  
8 everyone attending remotely will now state their  
9 appearance and affiliations for the record.

10 If there are any objections to proceeding,  
11 please state them at the time of your appearance  
12 beginning with the noticing attorney.

13 MR. TAYLOR: This is Wayne Taylor. I'm  
14 here on behalf of defendant Chubb Custom Insurance  
15 Company.

16 MR. LEE: David Lee here on behalf of Chubb  
17 as well.

18 MR. CONCHIN: This is Gary Conchin, and I'm  
19 here on behalf of the plaintiff, Haman, Inc., dba  
20 Knights Inn.

21 THE VIDEOGRAPHER: Thank you. We may  
22 proceed. Will the court reporter please swear in  
23 the witness.

24 DEPOSITION REPORTER: Raise your right  
25 hand, please.

1 Do you solemnly state the testimony you're  
2 about to give will be the truth, the whole truth,  
3 and nothing but the truth?

4 THE DEPONENT: I do.

5 MR. TAYLOR: This will be the deposition of  
6 Ms. Sheila Allen taken by virtue of an amended  
7 notice of video deposition. The deposition is being  
8 taken for purposes of discovery, cross-examination,  
9 and any other purpose permitted by the federal rules  
10 of civil procedure.

11  
12 SHEILA ALLEN,  
13 having been administered an oath, was examined and  
14 testified as follows:

15  
16 EXAMINATION

17 BY MR. TAYLOR:

18 Q Ms. Allen, we met just a few moments ago.  
19 My name is Wayne Taylor, and I represent Chubb  
20 Custom Insurance Company in connection with a  
21 lawsuit that was filed by Haman, Inc., doing  
22 business as Knights Inn, and we're here just to ask  
23 you some basic questions --

24 A Okay.

25 Q -- about what you might know concerning two

1 insurance claims that have been submitted on behalf  
2 of Haman, Inc. One for fire and then subsequently  
3 for damage allegedly as a result of wind. Okay?

4 Just a -- can I get you to just state your  
5 full name, please.

6 A Sheila Whitehead Allen.

7 Q And is Whitehead your maiden name?

8 A Yes.

9 Q And how old are, you ma'am?

10 A Are you kidding? You never ask -- you  
11 never ask a woman her age or weight, please.

12 Q I know. I'm sorry. I have to do that.

13 A 65.

14 Q And your date of birth?

15 A 12-26-54.

16 Q Very good.

17 Have you ever given a deposition before?

18 A I have not.

19 Q Okay. Well, let me explain. This is --  
20 it's not real formal. We do have a court reporter  
21 that's sitting across the table from me who is  
22 taking down your testimony.

23 And because you live out here in California  
24 where we are today and the lawsuit is pending in  
25 Alabama and you may not be able to attend the trial

1 if this case does to trial, we're also videotaping  
2 your testimony. So we have a videographer in the  
3 room.

4 And as you can see, the plaintiff's  
5 counsel, Mr. Conchin, is in his office in  
6 Huntsville, Alabama and he's participating by Zoom.

7 And then I'm going to be asking you some  
8 questions, mainly about your knowledge and about the  
9 hotel. And you just tell me what you know, and if  
10 you don't know something, you tell me you don't  
11 know, and then when I'm finished, Mr. Conchin will  
12 have an opportunity to also ask you some questions.  
13 Okay?

14 A Okay.

15 Q Very good.

16 One of the most important things about a  
17 deposition is we need to have a verbal response. It  
18 is human nature for people to nod their heads or  
19 give an "uh-huh" or an "uh-huh," those don't show up  
20 on the record very well.

21 So if you do that, I might ask you, "Is  
22 that a yes or is that a no?"

23 A I'm a talker. You won't have that problem.

24 Q Okay. Very good. Good. I'm glad to hear  
25 that.

1 But if in the event it does happen, I'll  
2 just ask you, "Is that a yes or is that a no?"

3 I just want you to know, I'm not trying to  
4 be rude. I'm just trying to make a good record of  
5 our conversation today.

6 A Okay.

7 Q Fair enough?

8 All right. If you don't understand one of  
9 my questions, by all means let me know. If you give  
10 me an answer, I can only assume you understood my  
11 question.

12 I'm in the here to trick you. I'm just  
13 here to ask you what you know and find out what you  
14 don't know. Fair enough?

15 A Okay.

16 Q Wonderful. One of the big things -- and  
17 the court reporter will get upset at us if we do  
18 this.

19 Please allow me to answer my question  
20 completely before you begin your answer, and I will  
21 likewise try to let you complete your answer before  
22 I ask my next question.

23 A So we're not interrupting each other.

24 Q Exactly.

25 Mainly -- while with could carry on a

1 conversation like that and it probably wouldn't be a  
2 problem, our court reporter can't get both of us  
3 talking at the same time.

4 A I understand.

5 Q Fair enough.

6 This is not a marathon. I don't think this  
7 is going to be a long deposition anyway, but you  
8 never know. I don't know what Mr. Conchin has in  
9 store for you. I only know kind of the area of  
10 questioning that I have for you, but it's not a  
11 marathon. Anytime you want to take a break, you  
12 just speak up --

13 A Okay.

14 Q -- and we will take a break. All right.  
15 Ten minutes, five minutes, however long you feel you  
16 need to get fresh air, to use the restroom, whatever  
17 it is. You just speak up and we will take a break.

18 A Okay.

19 Q The only thing I ask is that if there's a  
20 question on the table, if I've asked you a question,  
21 that you first answer the question before we take a  
22 break.

23 Fair enough?

24 A Fair enough.

25 Q Wonderful.

1           Okay. You are here in accordance with an  
2 Amended Notice of Deposition which I'm going to mark  
3 as Defendant's Exhibit 81 for identification.

4           (Defendant's Exhibit 81 was marked  
5 for identification.)

6 BY MR. CONCHIN:

7           Q I don't know that you've ever seen this  
8 document, but I will show it to you. This is  
9 actually a document that was served on Mr. Conchin  
10 and the other lawyers in this case, and that's just  
11 a notice to the other parties in the case, to all  
12 the parties in the case, that your deposition was  
13 going to take place today where we are now. Okay?

14          A Okay.

15          Q I would like to show you what I've marked  
16 as Defendant's Exhibit 82 for identification.

17          (Defendant's Exhibit 82 was marked  
18 for identification.)

19 BY MR. CONCHIN:

20          Q And this is a subpoena with a cover letter  
21 from me that was served upon you that commanded you  
22 to be here today.

23               Do you recall receiving this, ma'am?

24          A I have it right here in front of me.

25          Q And you brought the original that was

1 served on you?

2 A Yes, sir.

3 Q Very good.

4 And if you turn to the last two pages of  
5 the exhibit, there were some documents that had been  
6 requested. I didn't know if you possessed anything,  
7 but I felt like I should ask for you to bring  
8 whatever documents you might have in your  
9 possession.

10 And we had asked you to bring 12 different  
11 categories of documents.

12 Do you have any of the documents that are  
13 covered by these 12 categories?

14 A No. Because when you leave a business,  
15 you're not allowed to take any documents from that  
16 business with you.

17 Q Okay.

18 A It has to stay there.

19 Q So in response to the subpoena requesting  
20 documents, there are no documents in your  
21 possession; is that right?

22 A No. I have -- my knowledge is right here  
23 from remembering when I worked there.

24 Q And you were pointing to your head?

25 A Yes.

1 Q When you said that?

2 A Yes.

3 Q Thank you, ma'am. Very good.

4 Could you please provide me with your  
5 address, your current address?

6 A 470 Jackson Street, Colton, California  
7 92324.

8 Q And today we are in Riverside and is Colton  
9 relatively close to Riverside, California?

10 A About 25 miles.

11 Q Okay. Very good.

12 Are you married?

13 A Yes.

14 Q And your husband's name?

15 A Jim Strohm.

16 Q Spell Strohm.

17 A S-T-R-O-H-M.

18 Q And how long have you been married to  
19 Mr. Strohm?

20 A Two and half years.

21 Q Were you married previously?

22 A My husband is deceased.

23 Q Okay. And his name was?

24 A Rickey Goodwin.

25 Q And how long has Mr. Goodwin been deceased?

1 A 30 years.

2 Q Do you have any children?

3 A I have four sons.

4 Q What are their names?

5 A Chris, Jeremy, Casey and Rickey.

6 Q Okay. How old is Chris?

7 A He's 45.

8 Q And where does Chris live?

9 A In Alabama.

10 Q Where in Alabama?

11 A Troy.

12 Q Is Chris married?

13 A No.

14 Q Does he have any children?

15 A Three.

16 Q And are any of those children above the age  
17 of 18?

18 A Yes.

19 Q Okay. Where do the children live?

20 A In Dublin.

21 Q And how old is Jeremy?

22 A Jeremy is deceased.

23 Q I'm sorry.

24 Was Jeremy ever married, or does he have  
25 any kids?

1 A No.

2 Q And Casey -- do you need a minute?

3 A He's --

4 Q I'm sorry, ma'am.

5 A You caught me off guard with that question  
6 about my son.

7 Q I'm sorry.

8 A Casey is engaged. He has three children.

9 Q And where does Casey live?

10 A He lives in Brundidge, Alabama.

11 Q Where is Brundidge?

12 A About 20 minutes from Troy.

13 Q Are his three kids over the age of 18?

14 A He has four kids. Two of them are and two  
15 of them are seven and eight.

16 Q Okay. The two kids that are over 18, where  
17 do that live?

18 A Montgomery.

19 Q And finally, how old is Rickey?

20 A He's 30.

21 Q And if I asked, I apologize, but I didn't  
22 write down the answer. How old is Casey?

23 A I don't even know how old my kids are.  
24 Casey's 36.

25 Q And Rickey is 30 years old. Where does he

1 live?

2 A Here with me.

3 Q He's here in California?

4 A Yes.

5 Q Does he live in Colton at the Jackson  
6 Street address?

7 A Yes.

8 Q Does he have any children?

9 A No. He's still a child himself.

10 Q Understood. I have a 30-year-old myself  
11 who actually lives in Los Angeles that I got to see  
12 yesterday. So one of the benefits of being able to  
13 come out here and talk to you today was to get to  
14 see my son.

15 A Great. Great.

16 Q Who I hadn't seen since August. So...

17 A Oh, my goodness.

18 Q Did you speak with anyone in order to  
19 prepare for your deposition today?

20 A I did not. These papers is all I have to  
21 go by.

22 Q Okay. Did you review any records in  
23 preparation for your deposition today?

24 A Yes.

25 Q What records did you review?

1           A    I think it was just the records where I --  
2   I think it was just the records where I had fixed up  
3   an estimate myself.

4           DEPOSITION REPORTER:   Do you want to go off  
5   the record?

6           MR. TAYLOR:   Off the record.

7           THE VIDEOGRAPHER:   Okay.   We're going off  
8   the record.   This is the end of media unit one.   The  
9   time is 9:18 a.m.

10          (Recess.)

11          THE VIDEOGRAPHER:   We are going back on the  
12   record.   This is the beginning of media unit two.  
13   The time is 9:21 a.m.

14   BY MR. TAYLOR:

15          Q    Okay.   Back -- now that we're back on the  
16   record.

17               I had asked you if you spoke with anybody  
18   in preparation for your deposition and you had  
19   answered no.   Then I asked you if you had reviewed  
20   any records in preparation to give your deposition  
21   today and that's when we had to go off the record.

22               So that's the question on the table right  
23   now, ma'am.

24          A    No.

25          Q    So you've not reviewed any records?

1           A    All I have is what you sent me the first  
2   time and then this second time.

3           Q    The subpoenaed, in other words?

4           A    Yes.

5           Q    Okay. And the first time, you're talking  
6   about the first time we sent you a subpoena and your  
7   deposition had to be rescheduled?

8           A    Yes.

9           Q    Got it. Okay.

10                  Have you reviewed any photographs in  
11   preparation for your deposition?

12           A    Yes.

13           Q    Okay. What photographs did you review in  
14   preparation?

15           A    It was through an e-mail showing what the  
16   hotel looked like before and what it looked like  
17   now.

18           Q    And who sent you those photographs?

19           A    Mr. Conchin.

20           Q    When did you get those photographs?

21           A    Probably two months ago. I'm not sure on  
22   the dates now. I'm not sure on the date.

23           Q    Okay. So within the last couple of months  
24   before --

25           A    Yes.

1           Q    -- your deposition was scheduled initially  
2   you were sent photographs?  Deposition --

3           A    Yes.  Yes.

4           Q    Very good.

5                   And Mr. Conchin or his office sent you some  
6   photographs to look at?  That's a "yes"?

7           A    Yes.

8           Q    And how many photographs was it that he  
9   sent you?

10          A    I think it wasn't photographs.  It was a  
11   videotape showing what the hotel looked like when I  
12   was there as manager and showing what it looked like  
13   now.

14          Q    And you did not bring that videotape with  
15   you?

16          A    No.

17          Q    How long was that videotape?

18          A    About five minutes.

19                   MR. CONCHIN:  Wayne, it is the same  
20   videotape that we sent to you, the disk, that was  
21   taken in November or December.  So...

22                   MR. TAYLOR:  Thanks, Gary.

23   BY MR. TAYLOR:

24          Q    Was there any audio on that videotape, or  
25   was it silent?

1 A I believe there was audio on it.

2 Q Okay. Do you know who was talking?

3 A No.

4 Q When was the last time you looked at that  
5 video?

6 A Whenever it was sent to me, and I haven't  
7 looked at it again.

8 Q So when you received it a few months ago is  
9 when you looked at it?

10 A Yes.

11 Q And since that time you have not looked at  
12 it?

13 A No.

14 Q And I know that my office has spoken with  
15 you a couple of times to get your deposition  
16 scheduled.

17 A Yes.

18 Q Did you ever talk to anybody in my office  
19 about the facts of this case?

20 A No.

21 Q Okay. Could you give me the best telephone  
22 number to reach you just in case we do need to reach  
23 you?

24 A 909.645.6916.

25 Q Is that a cell phone?

1 A Yes.

2 Q And that's the best number to reach you?

3 A Yes.

4 Q Wonderful.

5 Can you tell me a little bit about your  
6 educational background.

7 A Okay. I went to Raleigh College for retail  
8 management. I've been in the hotel business for  
9 approximately 15 years.

10 And you've got my children's names and  
11 everything. My youngest son is out here and  
12 hopefully is being scouted for the L.A. Dodgers.  
13 He's very good.

14 Q Wonderful.

15 A Very good at playing ball.

16 And I met my husband. He's a gold  
17 prospector, and so is my niece. I came out here on  
18 vacation. Met her friend and we dated for two  
19 years, and then he asked me to marry him, and so  
20 here I am in California.

21 I do a lot of work for the homeless. I  
22 feed the homeless. I go visit the nursing home as  
23 a -- through our church. I go visit the nursing  
24 home to visit the elderly people that don't have  
25 that, and I definitely am a Days of Our Lives fan.

1 I go meet those stars in Universal Studio. And I  
2 made very good grades in college.

3 Q Where is Raleigh College located?

4 A It was in Troy, Alabama. That was probably  
5 30 years ago.

6 Q Okay.

7 A That I --

8 Q Understood.

9 And you got a -- what was the degree, a  
10 bachelor's degree or?

11 A Retail management.

12 Q Is it a bachelor's degree in retail  
13 management?

14 A No. It's just a retail management.

15 Q Okay. What kind of degree is it, though?

16 A It don't have -- I don't think it has a  
17 degree on it. It was just to learn about businesses  
18 and that got me -- lead me to the hotel business  
19 which had lead me to running restaurants.

20 I had a real popular restaurant in  
21 Montgomery, Alabama and then moved it to Troy.

22 And I am very close with my sons. I'm very  
23 organized when -- I take my jobs very serious, and I  
24 am a homemaker right now. I'm retired.

25 Q How long have you been retired?

1           A    For two years.

2           Q    Is the last hotel management job you had  
3 with the Knights Inn?

4           A    Yes.

5           Q    And how long were you the -- you were the  
6 manager of the Knights Inn; is that right?

7           A    Yes.

8           Q    How long were you the manager of the  
9 Knights Inn?

10          A    Let's see, the first time I was the manager  
11 for about a year and that was many years ago. And  
12 then I came back and I was probably there for three  
13 years.

14          Q    Okay. From when to when?

15          A    I left in April of 2015. And so I don't --  
16 so I guess I would have been there in 2012.

17          Q    Do you remember when you started in 2012?

18          A    I think in the month of July.

19          Q    And since you left in 2015, you've not  
20 managed a hotel?

21          A    No.

22          Q    Have you had a job since you left in 2015?

23          A    Yes. I ran a restaurant.

24          Q    What restaurant did you run?

25          A    WINGERS. It served hot wings.

1 Q And where was WINGERS located?

2 A In Montgomery, Alabama.

3 Q And what were the dates that you operated  
4 or managed WINGERS?

5 A Oh, geez. Probably the year of 2016 maybe.  
6 I'm not -- I'm not quite sure on all these dates. I  
7 don't keep up with dates like that.

8 Q How long were you the manager at WINGERS?

9 A Probably six months.

10 Q And what was the reason that you left?

11 A Because it was -- I just found out I was  
12 diabetic and it was too far for me to drive. We  
13 opened up at 10 o'clock in the morning and we closed  
14 at 10 o'clock at night, and then I was driving two  
15 hours a day.

16 Q So WINGERS was located in Montgomery --

17 A Yes.

18 Q -- where were you commuting to?

19 A Troy.

20 Q Back and forth to Troy?

21 A Yes. And that was just -- I done that and  
22 it was just too many hours. So I moved it to Troy.

23 Q Very good. And since you -- so you  
24 voluntarily left WINGERS?

25 A Yes. Yes.

1 Q And after WINGERS, have you held a job?

2 A No.

3 Q Okay.

4 A No.

5 Q When you were the manager at Haman, Inc.

6 between July of 2012 and April of 2015, did you also  
7 live in Troy or did you live on-site?

8 A I lived on site. That was a requirement.

9 Q So you lived in one of the units, then, one  
10 of the rooms?

11 A Yes.

12 Q Which room did you live in?

13 A 150.

14 Q Was that room one of the rooms of the  
15 building where the fire occurred in?

16 A No. No. This room was close to the  
17 entrance to the office because I worked nonstop. I  
18 mean, I had to be available 24 hours.

19 Q Okay. So there were two buildings that had  
20 rooms and one was the restaurant and the office;  
21 right?

22 A Yes.

23 Q Okay. So you lived in the other building  
24 that was not damaged by fire --

25 A Yes.

1 Q -- that had rooms?

2 A Yes.

3 Q What was the reason that you were no longer  
4 the manager -- that you left in April of 2015?

5 A I had a tragedy in my family, and I needed  
6 to go home.

7 Q Did this have to do with the death of your  
8 son?

9 A Yes.

10 Q When you say "had to go home," that would  
11 have been Troy?

12 And as I understand it, the fire that  
13 occurred to the other building that had rooms that  
14 you did not live in occurred in March of 2014.

15 Does that sound about right?

16 A Yes.

17 Q And did the Knights Inn have any other  
18 employees that actually lived on-site at that time?

19 A Yes.

20 Q How many employees were living on-site at  
21 the time that that happened?

22 A Let's see, there was Frazier and Helen,  
23 they were married.

24 Q I'm sorry?

25 A Frazier and Helen, they were married to

1 each other.

2 Q What's their last name?

3 A I don't know their last name.

4 Q Okay. Who else?

5 A And then there was Ms. -- I can't remember  
6 her name. Ms. Cheryl.

7 Q Do you remember Cheryl's last name?

8 A Cowin.

9 Q Cowin?

10 A Cowin.

11 Q Can you spell that, please?

12 A C-O-W-I-N.

13 Q Anyone else that lived on-site?

14 A Yasif Bukhari.

15 Q Anyone else?

16 A There was one other maintenance man, his  
17 name was KW. I do not know his last name.

18 Q KW was a maintenance man?

19 A Yes.

20 Q Okay. And let's go back up.

21 What did Frazier do for the hotel?

22 A Frazier helped with the laundry and Frazier  
23 helped clean the rooms.

24 Q How about Helen?

25 A She was a housekeeper.

1 Q So she cleaned the rooms?

2 A Yes.

3 Q Okay. And you don't remember their last  
4 name?

5 A You know, I never -- no. I do not remember  
6 their last name.

7 Q Okay. That's fine.

8 And Cheryl Cowin, what did she do?

9 A She was front desk.

10 Q And Mr. Bukhari?

11 A He was -- he was like over the maintenance  
12 and over the housekeepers and took care of that.

13 Q He supervised all of them?

14 A Yes. He supervised all that and was an  
15 excellent employee.

16 Q And then KW was the maintenance man?

17 A Yes.

18 Q He'd fixed things if they became broken.  
19 Roof needed to be patched, he could go up and patch  
20 the roof, that type of thing?

21 A I don't think he was into patching the  
22 roof, but he was definitely into fixing the  
23 plumbing, helping out with door locks, you know,  
24 that type of thing.

25 It cost right at \$80 to get somebody to

1       come out and repair those automatic door locks, and  
2       my son had showed him how to rebuild them. So that  
3       was an asset. He was an asset with that being said.

4           Q     Okay. Did any of your sons ever live  
5       on-site? Which ones?

6           A     Jeremy.

7           Q     The one that's deceased?

8                   And did Jeremy live with you or he had his  
9       own room?

10          A     He had his own room.

11          Q     Did Jeremy work for the hotel?

12          A     Yes, he did.

13          Q     What did Jeremy do for the hotel?

14          A     He said he was my boss.

15          Q     Is that accurate?

16          A     He was the one that actually got me the job  
17       there to help out. So he's been there longer than I  
18       had. So, yes, he had seniority over me.

19          Q     What did Jeremy do?

20          A     He did a lot of everything. All of the  
21       marketing, advertising, hiring, firing, you know.  
22       Just did all the Internet thing, you know, specials  
23       we'd have.

24                   When the ball game was in Tuscaloosa,  
25       Alabama, he would do ads and stuff like that. He

1 was just a computer person, pretty much.

2 Q Gotcha.

3 Did Jeremy just work for the hotel, or did  
4 he work for maybe broader and this hotel was just  
5 one of the things that he did?

6 A This hotel was just one of the things he  
7 did.

8 Q Who was he actually employed by?

9 A With the hotel?

10 Q Was he employed by Knights Inn?

11 A Yes.

12 Q Was he employed by Haman, Inc.?

13 A I don't know what Haman, Inc. is. I  
14 mean -- I'm assuming that's Knights Inn? Haman,  
15 Inc. is Knights Inn; correct?

16 Q Well, I'm assuming so. Or at least they  
17 owned it.

18 A Ms. Visram hired him. We met at the hotel  
19 I was running in Montgomery. She was looking for  
20 someone and a friend of ours knew her, and she came  
21 all the way to Montgomery to have a meeting, and I  
22 turned the job down, and my son took it.

23 Q Got it.

24 How long did Jeremy work for the hotel?

25 A He's been in the hotel business since he

1 was -- right out of college. I mean, he's just  
2 always been fascinated with Wyndham, Worldwide and  
3 things like that. He took a -- he took a liking to  
4 Ms. -- Mrs. Visram is why he went to work for her.

5 Q Okay. Do you know how long he actually  
6 worked for Ms. Visram or for the Knights Inn?

7 A Let's see, between -- I mean, he worked at  
8 the Ramada and the Days and -- probably with her,  
9 maybe three years. Maybe three years.

10 Q Did Mr. Bukhari actually do the maintenance  
11 or he just supervised the maintenance person?

12 A No. No. He was old but he definitely -- I  
13 tried to take as much off of him as I could because  
14 he was old, but he -- and not any offense to him in  
15 that, but he was trying to take on more than he  
16 could do. So I made some adjustments, but he had  
17 been there for 30 years, I think.

18 Q At the Knights Inn?

19 A Yes.

20 Q You had testified a little bit ago that you  
21 had attended Raleigh College and studied retail  
22 management? That's a "yes"?

23 A Yes. That is a yes.

24 Q Okay. Did you have any other education  
25 after high school besides Raleigh College?

1           A    Just the general studies, psychology, math  
2   132, English 101, just your --

3           Q    I'm talking about other than Raleigh  
4   College, did you --

5           A    No. No. I was going to pursue nursing and  
6   it just never fell -- it just never fell through for  
7   me. So I'd have kids and go to college.

8           Q    Before you came to the Knights Inn, where  
9   did you work?

10          A    I worked at the -- oh, it has an  
11   inground -- inside pool. InTown Suites, I believe,  
12   was the name of it.

13          Q    Where was it located?

14          A    It was located in Montgomery, and I also  
15   worked for the Kings Inn in Montgomery, and I was  
16   there for four years as the general manager.

17          Q    So the Kings Inn?

18          A    Was before the Knights Inn.

19          Q    Was before. Okay.

20                And what were the dates that you were the  
21   general manager of the Knights -- the Kings Inn?

22          A    I'm not sure. I think I left in -- I'm  
23   just not sure on those dates. I was there about  
24   five years.

25          Q    And then you went to the InTown Suites?

1           A    Yes.

2           Q    And how long were you -- what was your  
3 position there first?

4           A    I wasn't there very long because the  
5 manager -- I was the front desk clerk. I wasn't  
6 there because the manager was just rude, and I can't  
7 be around that kind of negativity.

8           Q    Did you leave voluntarily?

9           A    Yes.

10          Q    And you were the manager at the Kings Inn,  
11 what was the reason that you left the Kings Inn?

12          A    Because things there were getting kind of  
13 rough, and my son was the head of the security  
14 there, the cage fighter, the 30 year old. He was  
15 security there. And I just kept having some  
16 problems with the security.

17               And then we had a bar on the inside of the  
18 hotel. And the man that had the bar, he hired  
19 security -- it was in the contract -- he hired --  
20 that I had put in there. He hired his own security  
21 for the weekends because you got 500 people going in  
22 and out of a bar, you know, Thursday, Friday and  
23 Saturday.

24               So he hired security to help with the  
25 parking lot, security to help with the safety of the

1 hotel. And I just kept -- I don't know, I just kept  
2 having this gut feeling that something was wrong,  
3 and I told my son I didn't want him to do security  
4 anymore. It was just a gut feeling, a mother's  
5 intuition. And I have those a lot, and I usually  
6 listen to myself.

7 And I quit. I gave my notice, and I left  
8 on a Monday morning with a U-Haul and moved back to  
9 Troy. No, actually, I moved back to Dublin. I  
10 moved to Dublin for the first time, and I got a call  
11 that Friday night saying that two people were killed  
12 in front of the hotel.

13 Q Wow.

14 A And my son would have been in that if I had  
15 not left. So I loved the job. It was a really good  
16 job. It was a really good job. I'm not a drinker.  
17 So the bar didn't benefit me any except the money  
18 for the lease, you know, I could use it.

19 Q Understood. And then when you were at the  
20 InTown Suites, how long were you there?

21 A I wasn't there very long. Maybe five  
22 months.

23 So he can hear everything that we're  
24 saying?

25 Q And he can see you.

1           A    Oh, he can see me too?

2           MR. TAYLOR:   Wave to her, Gary.

3           MR. CONCHIN:   Yeah.   I can hear everything  
4   and see everything.

5           THE DEPONENT:   Oh, okay.   Okay.

6           MR. CONCHIN:   And then when Wayne gets  
7   through then I'll ask questions.   We can take a  
8   break at any time.   All you got to do is tell one of  
9   us.

10          THE DEPONENT:   Okay.

11       BY MR. TAYLOR:

12          Q    Have you ever before today at any time had  
13   a conversation with Mr. Conchin about this case?

14          A    Not as much about this case.   He called me  
15   and asked me could he give you my phone number, and  
16   I told him yes.

17          Q    Is that the only time you've had a  
18   conversation with Mr. Conchin before today?

19          A    Pretty much.   Other than the video that --  
20   you know, that he sent me.

21          Q    Well, he sent that by e-mail.   After you  
22   looked at it, did you call him?

23          A    No.

24          Q    Did he call you?

25          A    No.

1           Q    Did you speak about the video after he sent  
2   it to you?

3           A    No.   Because I already knew what the hotel  
4   looked like when I was there.   I was shocked,  
5   however, was it looked now.

6           Q    Understood.

7                   And as part of your compensation at the  
8   Knights Inn, I take it you were given a room to live  
9   in?

10          A    Yes.

11          Q    Okay.   And then you also were compensated  
12   in addition to that?

13                   In other words, you received a salary or  
14   something along those lines, some form of  
15   compensation?

16          A    Actually -- actually, I wasn't compensated  
17   for the room.   That came out of our pay.   We had to  
18   pay for our own room.

19          Q    Okay.   But you were required to live  
20   on-site?

21          A    Yes.

22          Q    Okay.   And what was your compensation to be  
23   the general manager at the Knights Inn when you were  
24   there?

25          A    I would rather not discuss money-wise.

1           Q   Well, can you tell me this: Were you paid  
2 a straight salary, or were you paid on a percentage  
3 of revenues?

4           A   No. Salary.

5           Q   And how would you describe your duties as  
6 if general manager?

7           A   I don't have all day, Mr. Taylor. I threw  
8 myself into that job 100 percent because it was a  
9 challenge, and I like challenges.

10                   It needed some upgrades. Like I put new  
11 curtains and so forth, had the carpet cleaned.

12                   The fire marshall and I became really good  
13 friends. I was up to all the fire marshall codes.  
14 Everything he would give me to do, I had it done.

15                   And he would definitely be a character  
16 reference for me because I did everything that he  
17 asked.

18                   I made out the schedules. I worked with  
19 the housekeepers. If one was out, I would fill in.  
20 If a front desk clerk -- I'd work a double shift.  
21 There were a lot of duties as a general manager. To  
22 oversee the whole hotel pretty much.

23           Q   Were you responsible for hiring and firing?

24           A   Yes.

25           Q   And the employees that were living on-site

1 at the time the fire occurred in March of --

2 A Was Frazier, Cheryl, Ms. Helen, that was  
3 her name. Ms. Helen and --

4 Q Cheryl?

5 A Yasif Bukhari.

6 Q Right. Did you hire Frazier and Helen or  
7 were they already there --

8 A I hired them all. I replaced every  
9 employee there when I got there because of things  
10 that were -- they were not doing or things they were  
11 doing.

12 Q Okay. Except for Mr. Bukhari who was  
13 already there?

14 A Except for Mr. Bukhari.

15 Q Because he was there for 30 years?

16 A He fed me a lot. I don't know what kind of  
17 food it was either.

18 Q Fair enough.

19 Did a gentleman by the name of Kenneth  
20 Parker ever work at the hotel?

21 A Yes.

22 Q Does that name sound familiar?

23 A Yes.

24 Q Okay. Was he living there at the time of  
25 the fire because you did not list him originally?

1           A    Yes, I did.  KW.  I gave you his name, KW.  
2   The maintenance man.

3           Q    Oh, that's Kenneth Parker?

4           A    Yes.  That's KW.

5           Q    And you hired him?

6           A    Yes, I did.

7           Q    Okay.  And did the -- which buildings did  
8   the employees that lived on-site at the time, did  
9   they all live in the other building where the fired  
10  occurred or did any of them live in the same  
11  building where you lived?

12          A    KW lived in the building that I lived in.  
13  He fixed up one of the rooms that I had blocked off.  
14  He repaired it, fixed it him up himself because he  
15  wanted to stay over there.

16          Q    And then the others lived in the --

17          A    Yes.

18          Q    -- building where the fire occurred?

19          A    Yes.

20          Q    So the employees that lived on-site, was  
21  the cost of the room deducted from their salaries  
22  also --

23          A    Absolutely.

24          Q    -- or just yours?

25          A    Absolutely.

1           Q    Okay.  So they would all -- whatever  
2           compensation they were paid, the cost of the room  
3           was then deducted?

4           A    Yeah.

5           Q    On all of them?

6           A    Yes.

7           Q    Okay.  How long was Mr. Parker an employee  
8           of Knights Inn?

9           A    He was probably there about -- about a  
10          year.

11          Q    And he was there at the time of the fire?

12          A    Yes.

13          Q    Okay.  Do you know how long after the fire  
14          it was before he left the Knights Inn?

15          A    I don't know.  When I left, he was still  
16          there.

17          Q    Oh.  So he was still there in April 2015  
18          when you left?

19          A    Yes.

20          Q    When you left the Knights Inn employment in  
21          April 2015, is that the last time you were there?

22          A    Yes.  Yes, it was.

23          Q    Okay.  You've never been back since?

24          A    No.

25          Q    Who was responsible for handling the

1 finances at Knights Inn? In other words, running  
2 reports, making the deposit, that type of thing?

3 A Well, the front desk kind of ran itself, as  
4 far as your night audit. That had to be turned in,  
5 the front desk clerk closed it out, the one that  
6 worked at midnight.

7 The night audit, as far as making financial  
8 decisions, I did that after approval from Ms. V.

9 Q Who prepared financial statements, those  
10 types of things, for the owner to look at?

11 A Yasif wrote the checks out. I wasn't -- I  
12 didn't have access to the checking account. He  
13 would -- she would write out the checks. He would  
14 get ready what he needed, or he would have  
15 permission to pay for it with a check.

16 Q He dealt with Ms. Visram directly on that?

17 A Yes. He had permission to write out a  
18 check for what we needed when we ordered bathroom  
19 tissue, sheets, that -- cleaning supplies, that sort  
20 of thing.

21 Q Did you have check-writing authority?

22 A No, I did not.

23 Q Did Ms. Cowin have check-writing authority?

24 A No.

25 Q Was she the night person that did the

1 auditing?

2 A No. Whoever worked did the night audit.  
3 It runs itself. The computer runs it. You close it  
4 out and it runs itself, and you just put it in an  
5 envelope.

6 Everything that was done for business that  
7 day goes in an envelope, and it is saved, and then  
8 all the money is in a safe that -- I didn't have  
9 access to the safe either.

10 Q Who made the deposits?

11 A Yasif Bukhari.

12 Q Okay. And the records that were put into  
13 an envelope when the audit -- the night audit was  
14 done, who was that given to?

15 A It was given to me and I filed it, but it  
16 would have to first be taken to Ms. V. for her to --  
17 for her to look at the credit card statement and  
18 the -- I would usually go over it and find any  
19 mistake before I took it to her and try to correct  
20 it, but it had better match up. Everything -- she  
21 was accurate on her accounting abilities.

22 Q Okay. And how often did Ms. Visram come  
23 and visit the Knights Inn?

24 A At least twice a week.

25 Q And how long would she stay when she would

1       come?

2               A     Just to pick up the night audits or to walk  
3       around and see that everything was in order. She  
4       was really -- really surprised at all of the  
5       upgrades, you know, that I had made there that  
6       didn't -- it wasn't very expensive, but it was very  
7       more elegant looking than it was before. She was  
8       impressed.

9               She would come and check it out and look,  
10      or I would show her what I had done.

11              Q     Were there records kept of all the  
12      improvements that were made?

13              A     I don't think we kept records because it  
14      was just something as me, into decorating, did. You  
15      know, like new curtains for the Knights Inn.  
16      Knights Inn curtains go over to the Studio Inn, you  
17      know. Upgraded one and then upgraded another one  
18      with the leftover materials.

19              Q     I see. And when the curtains were  
20      purchased, was that done with Ms. Visram's  
21      permission?

22              A     I do not know when the curtains were  
23      purchased. I was cleaning out stuff, per the fire  
24      marshal, that any rooms that had -- looked like  
25      they'd be a fire hazard, he wanted it cleaned out.

1                   So I was going through this room, and I  
2                   found brand-new stacks of new curtains and shower  
3                   curtains. They were brand-new. So I took the  
4                   brand-new curtains and put them in the Knights Inn  
5                   and took the old curtains from -- well, they weren't  
6                   really old but took the old curtains from the  
7                   Knights Inn and redid the Studio Inn.

8                   Q     Just so that I can get an idea. The  
9                   building where the fire occurred, was that the  
10                  Knights Inn or was that the Studio Inn?

11                  A     That was the Studio Inn.

12                  Q     I see.

13                  A     That was where I -- a lot of the revenue  
14                  came from. I used that for weekly rooms.

15                  Q     The Studio Inn?

16                  A     For work crews, yes.

17                  Q     I see.

18                        So that was more long-term residents, so to  
19                  speak?

20                  A     No. It would be work crews that would come  
21                  and leave. You know, they needed a place to stay  
22                  while they were working, and they would stay there  
23                  for a month.

24                  Q     Right. That's what I was meaning.

25                  A     Yes. Yes.

1 Q Gotcha.

2 A And the fire marshal said that, you know, I  
3 had to shut down that hotel. I had to block it off  
4 because the main thing that he wanted to be fixed  
5 was the steel beams. He said that was a hazardous  
6 and liability for the hotel.

7 Q When was this?

8 A This was right after the fire.

9 Q Oh, after the fire?

10 A Yeah. After the fire. I mean, I had to  
11 get those steel beams repaired. So I got somebody  
12 to come out there and give an estimate and --  
13 without any money to repair them with, I couldn't  
14 repair them because it was very expensive.

15 And so the fire marshal come back and said,  
16 "Sheila, I'm going to have to shut it down until you  
17 get this fixed."

18 Q Who was the company that you got a bid to  
19 fix the steel beams from?

20 A You know, I dealt with so many people, a  
21 lot of them shady, a lot of them overpriced.  
22 Brentbriar, Brentwood. I'm not -- I'm not real --  
23 they were just supposed to come out there and look  
24 at the steel beams.

25 That was a hazard. Those beams were burned

1 up above the room that caught on fire and on the  
2 balcony. They had to be repaired, and he shut me  
3 down because I didn't have the money to repair them.

4 Q Okay. We'll talk about the fire loss in  
5 just a minute.

6 Did the Knights Inn have an accountant  
7 where all the financial records were sent so that  
8 financial statements could be created?

9 A Not that I'm aware of. I don't know the  
10 extent of what she had with an accountant. I do  
11 know that she had an accountant; but, you know, once  
12 I did the night audit, I was done with it. She took  
13 it from there, but I do know she had an accountant.

14 Q Very good. I apologize. I do -- I just  
15 have to ask this question.

16 Have you ever been convicted of a felony?

17 A Absolutely not.

18 Q Have you ever been arrested for anything  
19 other than a traffic violation?

20 A No. I haven't even been arrested for a  
21 traffic violation.

22 Q Fair enough.

23 Are you taking any medication that affect  
24 your memory in any way?

25 A Absolutely not.

1 Q Very good.

2 So as I understand it, then, what I'm  
3 calling in general as the Knights Inn is really  
4 three buildings; right?

5 A Studio Inn, Knights Inn and then the office  
6 and the ballroom.

7 Q And then there was a restaurant and bar in  
8 there as well?

9 A Yeah. In the back of the -- we had that  
10 shut off. That was my storage room, pretty much.

11 Q Very good.

12 So where the office was located, that was a  
13 ballroom and an office and a bar, there were no  
14 rooms there?

15 A No. And my office was in there as well.

16 Q Got that. And that's where all the records  
17 were kept?

18 A That's where the records were kept. That's  
19 where I stayed most of the time. That's the front  
20 desk. We had filing cabinets. You know, we could  
21 only keep so much before we had to box them up.

22 Q And then when you boxed up the records,  
23 where would you move them to?

24 A We had a storage room for all the records.

25 Q And was that storage room in the same

1 building or was it in a different building?

2 A It was in the Studio Inn building.

3 Q So would the night audit records be  
4 provided to Ms. Visram and after she looked at them  
5 she would give them back, or would she keep them?

6 A She would give them back, and then I would  
7 store them in the filing cabinet or where -- you  
8 know, that piles up really fast, but you have to  
9 keep them.

10 She wanted to keep the records for at least  
11 two -- two or three years.

12 Q Okay. Were the records also computerized?  
13 Were they backed up in a computer?

14 A Yes. Yes.

15 Q Okay. And when you would run a backup,  
16 what would you do with the backup? Where would that  
17 go?

18 A To Ms. Visram.

19 Q So she would have had all the backups then?

20 A No. I'm not saying that she would have had  
21 all of the backups, but when we did backups, it just  
22 automatically did it. We didn't have anything to --  
23 you know, like a chip to put in the computer or  
24 whatever. It just automatically backed them up and  
25 stored in the computer itself.

1           Q    Okay.  How many rooms -- well, we got  
2   the -- what I'm calling the office building, but  
3   it's the office, the ballroom, et cetera, that we  
4   just discussed, and it did not have any rooms.

5                   And then there is the Knights Inn --  
6   building which you're calling the Knights Inn  
7   building.  How many rooms did that have?

8           A    Well, let's see, I think there was 20 on  
9   one side, 20 on another side, 20 up top.  I'd say  
10  80.

11          Q    How about the Studio Inn?

12          A    I don't know if they had the same amount or  
13   not.  I'm trying to visualize it.  I'm not sure if  
14   they had the same amount.  Maybe 60, maybe.  I don't  
15   want to tell you something and me not be for sure.  
16   I'm just not sure how many rooms were in the Studio  
17   Inn.

18          Q    Very good.  And during 2014, what were your  
19   average occupancy rates for the Studio Inn?

20          A    We rented them by the week.  The weekly  
21   rooms for -- that we rented by the week, and then we  
22   did have people, if they didn't have enough money  
23   for the Knights Inn, I would let them get a room  
24   over there for like \$50.

25          Q    What was the occupancy rate over there?

1           A    It was weekly. We had a lot of weekly  
2 things. So the occupancy was pretty good over  
3 there.

4           Q    What was the percentage? Would you have to  
5 look at the records in order to know that?

6           A    No. I would say probably 20 to 25 tenants  
7 over there and -- plus the employees.

8           Q    And during 2014, what were the occupancy  
9 rates for the Knights Inn building?

10          A    That was a -- those were really nice rooms.  
11 We had upgraded a lot over there so -- let's see.  
12 We had the front side, which was always rented. So  
13 that's like 20 rooms. Probably 30 a week.  
14 Sometimes we would have people book the whole hotel.

15          Q    I'm looking for an average, though. So on  
16 average, 30 rooms a week?

17          A    Give or take.

18          Q    Okay. Fair enough. During 2013 and 2014  
19 before the fire, had you received any complaints  
20 from any of the guests about leaks or other problems  
21 with any of the rooms?

22          A    No. We had -- you're talking about prior  
23 to the fire?

24          Q    Yes. Any complaints?

25          A    No. We did not have any complaints.

1 Q Ever?

2 A I mean, we had complaints about the  
3 customer service or the maids or something like  
4 that. We would have complaints about a sink being  
5 stopped up or -- you know, we had several  
6 complaints, but I don't ever remember one of it  
7 being leaking or smelling or mildew or mold or  
8 anything like that. We pretty much had to stay on  
9 top of that.

10 The health department -- I was in good  
11 standing with them, and they would -- you know,  
12 they'd make me correct it or threaten to shut it  
13 down if I didn't correct it. So we kept all that up  
14 to standards.

15 Q And as I understand it, after the fire  
16 occurred, you were the point of contact with a  
17 representative hired by Chubb, his name was Brent  
18 Parrish.

19 Do you remember that name?

20 A I do.

21 Q Do you remember dealing with him?

22 A Yes, I do.

23 Q Okay. And do you recall that as part of  
24 the investigation of the claim that Mr. Parrish  
25 asked you to prepare a contents inventory of the

1 rooms that were damaged as a result of the fire?

2 A I did the best I could. That wasn't my  
3 expertise, but I did put like lamps, curtains,  
4 drapes or, you know, beds, furniture, you know,  
5 things like that.

6 Q Okay. Do you -- had you heard about or  
7 been told by anyone that Ms. Visram was not pleased  
8 with the job that you did in connection with the  
9 contents inventory?

10 A No, I have not. I know that with Brent  
11 Parrish -- I wasn't aware that she had said that,  
12 but with Brent I couldn't get -- you know, I just  
13 couldn't get them to pay off -- he was having to go  
14 through people.

15 I needed money to start preparing that  
16 hotel. Getting it back in order. And I was just on  
17 the phone with him constantly until finally  
18 Ms. Visram just took it over.

19 Q Okay. Well, we'll talk about when  
20 Ms. Visram took it over, but let me show you what I  
21 have marked first -- I'm a little out of order and I  
22 apologize -- as Exhibit 85 for identification.

23 (Defendant's Exhibit 85 was marked  
24 for identification.)

25 ///

1 BY MR. TAYLOR:

2 Q And ask if you've ever seen that document  
3 before?

4 A Oh, yeah. This was a rough to give him  
5 some kind of idea of the stuff, you know, like the  
6 comforters and the sheets, the curtains, lamp  
7 shades, anything that was -- that was going to have  
8 to be replaced, contents only, with the smell of  
9 fire.

10 I mean, I didn't realize that one room  
11 could make the whole thing smell like smoke. I  
12 wasn't aware of that, but that was just -- just to  
13 get something started.

14 This probably is not a 100 percent on my  
15 job. I did this after hours and just -- I wasn't  
16 going with the furniture. I was just going with the  
17 comforters, the sheets, stuff like that.

18 (Defendant's Exhibit 84 was marked  
19 for identification.)

20 BY MR. TAYLOR:

21 Q Okay. Let me show you what's been marked  
22 as Exhibit 84 for identification. You can hold onto  
23 that because we may refer to it again.

24 And this appears to be --

25 MR. CONCHIN: Wayne, would you just

1 generally describe what you're -- the exhibit. I  
2 can probably find it here if I know what to look  
3 for.

4 MR. TAYLOR: Defendant's Exhibit 85 that I  
5 marked for identification is the contents worksheet  
6 that was prepared by Ms. Allen.

7 MR. CONCHIN: Okay. Thank you.

8 MR. TAYLOR: And then the -- what I've  
9 marked as Defendant's Exhibit 84 for identification  
10 is the e-mail from Brent Parrish to Ms. Allen dated  
11 May 13, 2014.

12 MR. CONCHIN: All right. Gotcha.

13 BY MR. TAYLOR:

14 Q Have you had a chance to look at what I've  
15 marked as Exhibit 84 for identification, ma'am?

16 A Yes. I'm looking at it, and this is  
17 something that I gave him just to get the ball  
18 rolling.

19 Q Okay.

20 A This was nothing to do with the ceiling,  
21 the carpet, none of that.

22 Q Okay. Well, I just want to ask you if you  
23 received this e-mail. It was addressed to you; is  
24 that correct?

25 A We were doing a lot of talking, Brent

1 Parrish and I --

2 Q Ma'am -- ma'am, I don't mean to be rude. I  
3 need you to answer the question that I've asked.

4 Is that the e-mail that he sent you?

5 A I'm not sure.

6 Q Okay. On the last page there's a contents  
7 worksheet, and he says in the e-mail that he gave  
8 this to you to work as a specimen; is that right?

9 A That is correct.

10 Q And then when we look at Exhibit 85 that  
11 we've marked for identification --

12 A Yes.

13 Q -- we've got kind of a room-by-room  
14 contents inventory based on the form that he sent  
15 you; is that right?

16 A That is correct.

17 Q And then you prepared this document that's  
18 been marked as Exhibit 85 for identification?

19 A Just to get something started and to show  
20 him the contents of how badly everything smelt like  
21 smoke. That's what I gave him.

22 Q Ma'am, did you prepare this document that's  
23 been marked as Exhibit 85?

24 A Yes, I do. But it is not an accurate of  
25 what we really needed. I mean, that's not my

1 expertise.

2 Q I understand. But you prepared this?

3 A Yes, I did. Momentarily so we could get  
4 something started.

5 Q And then you sent this back to Mr. Parrish?

6 A I think I faxed it back to him.

7 Q Okay. And is there a cover e-mail that  
8 says, "Hey, here it is, but it's not complete."

9 Did you ever tell him that in your e-mail?

10 A Oh, I'm sure I did. I'm sure --

11 Q In an e-mail or in writing?

12 A On the phone, most likely.

13 Q Okay. Did you do it in writing?

14 A No, I did not. I mean, not that I  
15 remember. I could have but not that I remember  
16 unless you have a cover sheet. I don't have access  
17 to anything there. You can't --

18 Q Well, I will tell you, I haven't seen one,  
19 that's why I'm asking if you remember doing it in  
20 writing. No? Okay.

21 Let me show you what's been -- is that a  
22 no? I need a verbal response.

23 A You got to understand. You got to be  
24 patient with me because you're asking me questions  
25 of things that happened a long time ago.

1           Q    I understand. I understand. But I do need  
2   you to answer the questions I'm asking. So that's  
3   part of it.

4                   Let me show you what I've marked as  
5   Exhibit 83 for identification.

6                   (Defendant's Exhibit 83 was marked  
7                   for identification.)

8   BY MR. TAYLOR:

9           Q    This is a letter dated September 10, 2015  
10   from Ms. Visram to Glen Parrish.

11                   Have you ever seen this letter before?

12           A    This is pretty much correct except -- I  
13   mean, I didn't know she felt that way, but my -- my  
14   forms that I filled out, they weren't accurate  
15   enough. It was just momentarily.

16           Q    Okay. So when you say that this is pretty  
17   much accurate. The second sentence (as read):

18                   "The first list" -- which  
19                   we've now marked as Exhibit 85 for  
20                   identification -- "was a partial  
21                   list that was hastily prepared by my  
22                   manager at the time, Sheila."

23                   So you're saying that's basically correct?

24           A    I don't think it was hastily done.

25           Q    Okay.

1 A It was done after hours on my own time.

2 Q Then -- on your own time. Okay.

3 Were you paid on an hourly basis?

4 A No.

5 Q Or were you salaried?

6 A Salary.

7 Q But the month, by the week?

8 A By the week.

9 Q Okay. And then the next sentence after  
10 that, it says (as read):

11 "I was having problems with  
12 Sheila in many areas and found that  
13 she did not take the time to do a  
14 proper list of our damage contents."

15 Is that statement accurate?

16 A As far as damaged contents, she's talking  
17 about carpet, roofs and stuff like that, you know.  
18 I didn't -- I only did the contents, but I never  
19 hastily did anything. I always took my time. So  
20 that part is not correct.

21 Q So you disagree with Ms. Visram that you  
22 hastily prepared the document?

23 A I didn't hastily prepare it. I took my  
24 time the best I could with the contents.

25 Q And then said she was having problems with

1       you in many areas?

2           A     I was a good manager. The best manager  
3       that hotel has ever had.

4           Q     So you disagree with Ms. Visram?

5           A     I disagree with her on that.

6           Q     Okay. And that (as read):

7                         "She did not take the time  
8                         to do a proper list of our damage  
9                         contents."

10          A     That depends on what she thought was  
11       damaged contents. I didn't go with walls and  
12       ceilings and stuff like that. I only did the  
13       curtains, the bed wear, and shades, you know, for  
14       the lamps and stuff like that.

15          Q     And the furniture?

16          A     I didn't do any of the furniture. I only  
17       did like the contents of what was smelling like  
18       smoke the most. I only did that. So she has a  
19       point there. I didn't -- I mean, I -- this is what  
20       I prepared.

21          Q     So you don't know what kind of problems  
22       that Ms. Visram was having with you that she's  
23       referencing in this letter?

24          A     She didn't have any problems with me.

25          Q     Okay. Any idea why she would have said

1       this then?

2               A     Maybe she thought that I wasn't getting  
3       things done fast enough for Brent, but I couldn't if  
4       I didn't have any money to get them started with.  
5       That would be my only assumption of that.

6               Q     Did you ask Ms. Visram to provide you any  
7       money to be able to do some of this stuff?

8               A     Well, the insurance wasn't paying. So she  
9       didn't have it to give me. Of course I did.

10              Q     Okay. You did ask her?

11              A     Yes. And of course we were waiting on the  
12       insurance. I couldn't do anything without any  
13       money.

14              Q     Was there any discussion about going to a  
15       bank and borrowing the money until the insurance  
16       company made payment?

17              A     No. No.

18              Q     And then the next sentence after that (as  
19       read):

20                               "Many of the rooms were  
21       smoke damaged as well as water  
22       damage and the contents in them were  
23       damaged at the same time."

24                               Do you agree with that statement?

25              A     On where the fire was at?

1 Q Yes.

2 A They were smoke damaged most definitely.

3 Q And that's what you included on the  
4 contents inventory. Anything that you could smell  
5 with smoke damage --

6 A Yes.

7 Q -- you listed it; right?

8 A I did.

9 Q Okay. And then the next sentence says (as  
10 read):

11 "Sheila overlooked many of  
12 them."

13 Do you agree with that or disagree with  
14 that?

15 A She could be right. I might have  
16 overlooked them, but I was just doing for Brent the  
17 contents, you know, like Room 112, what I needed  
18 replaced.

19 And I assumed from him it was just the  
20 curtains and the comforters and stuff. We weren't  
21 talking about carpet and walls and ceiling tiles.

22 Q Okay. When you set those aside, if you  
23 take walls and carpet and tile and put that aside,  
24 do you feel that you did a complete contents  
25 inventory of each of the rooms?

1           A    I did. But that's just the curtains and --  
2 understand, that's just the curtains and the drapes  
3 and the bed wear, the comforters and so forth.

4           Q    And when you did that, you felt it was  
5 complete?

6           A    No. I knew it wasn't complete. I knew we  
7 wasn't even getting started where we needed to be.

8           Q    No. I'm talking about what you put down  
9 was complete?

10          A    What I put down was just a partial --  
11 something to get started where I could get money to  
12 start repairing this hotel. We were losing money  
13 because the fire marshal had blocked it off.

14          Q    Ma'am, I think we're like two ships passing  
15 in the night. I'm talking about just contents.

16               MR. CONCHIN: Hold on now. Hold on.  
17 You've asked her the same question four or five  
18 times.

19               MR. TAYLOR: I know.

20               MR. CONCHIN: Just let her answer.

21               MR. TAYLOR: Thank you. And she is  
22 answering.

23               MR. CONCHIN: Don't cut her off. Let her  
24 finish her answer.

25               MR. TAYLOR: I didn't cut her off.

1 MR. CONCHIN: You just did.

2 MR. TAYLOR: I did not, Gary. She had  
3 stopped.

4 BY MR. TAYLOR:

5 Q I'm talking about just the contents. I'm  
6 not talking about the walls. I'm not talking about  
7 the carpet. I'm not talking about tile.

8 A We're just talking about --

9 Q About the contents.

10 A The sheets and the comforters is pretty  
11 much what -- what I've covered on here and lamp  
12 shades.

13 Q And curtains?

14 A And drapes.

15 Q Okay.

16 A Yeah. And that was to Brent, and that was  
17 to get us started. We had to start somewhere. I  
18 was losing money.

19 Q And you included mattresses if they were  
20 damaged; right?

21 A I did not include the mattresses.

22 Q If you look at the second page of what  
23 we've we marked as --

24 A I mean, if they're not on every page,  
25 pretty much all of them were the same thing. If

1       they're not, then that means that that mattress  
2       was --

3           Q     So if you listed a mattress in one room,  
4       that meant it was damaged; right?

5           A     Yes.

6           Q     And if another room does not have the  
7       mattress listed, did that mean, in your estimation,  
8       it was not damaged?

9           A     That's what I would assume. I wouldn't  
10      just overlook it.

11          Q     Okay. And you also would have included  
12      dressers and TV stands and tables?

13          A     It did not -- I did not do any of that.

14          Q     Well, if you look at the fourth page,  
15      ma'am. Room 169, you list the dresser.

16          A     169 was very adjacent to the room that the  
17      fire was at.

18          Q     I understand, but you listed the dresser on  
19      there, didn't you?

20          A     Whatever I listed on here is what I thought  
21      at the time was damaged.

22          Q     Right. So you would -- so if you thought  
23      that furniture was damaged, you listed it; right?  
24      Dresser --

25          A     If I thought it was. The reason the

1 dresser is on this one, it was right adjacent to the  
2 room on the back, you know, where the fire was at.  
3 So there would have had to be a reason that I put  
4 that there.

5 Q So you did put down furniture if you  
6 thought it was damaged?

7 A I did, but then -- I'm not an expertise in  
8 that. I'm just going by what I needed to get  
9 repaired the fastest and the quickest.

10 Q I understand. But the point is -- and you  
11 did the best that you could?

12 A Yes, I did, with what I had to work with.

13 Q Right. And you went in there and you went  
14 into a room, and if you felt it was damaged, you  
15 would put it down.

16 And I'm not talking about the carpet or the  
17 tile or the walls, I'm just talking about contents  
18 items. If you thought it was damaged, you put it  
19 down; right?

20 A Yes.

21 Q Okay. That would include furniture if you  
22 thought it was damaged, because there are some rooms  
23 here where you listed furniture; right?

24 A Yes. You got to understand, this is from a  
25 long time ago. So...

1 Q I understand.

2 Are you okay? We've been going for a  
3 little bit over an hour. Would you like to take a  
4 break?

5 A Can I have an orange juice?

6 Q Absolutely. Why don't we take a  
7 five-minute break.

8 A Okay. That would be great.

9 THE VIDEOGRAPHER: We're going off the  
10 record. This is the end of media unit two. The  
11 time is 10:18 a.m.

12 (Recess.)

13 THE VIDEOGRAPHER: We're going back on the  
14 record. This is the beginning of media unit three.  
15 The time is 10:29 a.m.

16 BY MR. TAYLOR:

17 Q All right. Ms. Allen, when repairs needed  
18 to be made, you know, if there was an issue with a  
19 leak or whatever, would that have to go through you  
20 or would that just go to Mr. Bukhari who then would  
21 deal with Ms. Visram?

22 A Both.

23 Q Okay. Did you yourself ever make periodic  
24 repairs?

25 A Yes.

1 Q Excuse me. I said that wrong.

2 But you did make periodic repairs yourself?

3 A Yes.

4 Q What kind of repairs would you perform?

5 A If we had some -- just say the maintenance  
6 in the grounds, you know, that needed to be redone.  
7 Just -- I mean, I know this sounds silly, but like  
8 to save on money and make things look better -- my  
9 father used to take me out into the woods with a  
10 wheelbarrow and get pine straw.

11 So we would go and get pine straw, come  
12 back and do the flower beds and upgrade them and  
13 make them look so much better. Just that little --

14 Q So you might do some landscaping or  
15 whatever on your own?

16 A Yes. Yes. And pressure washing. I mean,  
17 I know how to do all that. I was raised with four  
18 brothers. I knew how to pressure wash the sidewalk  
19 and just do things that when they were really,  
20 really busy. Like it would be periodically cleaning  
21 the windows the maids were to keep them clean  
22 inside. The maintenance was to keep them  
23 clean outside.

24 Q And you would do that, or you would do the  
25 inspection just to make --

1           A    I would help.

2           Q    Okay.  You would help.

3                    So would you actually make any repairs of  
4 any damage?

5           A    You know, I did so much there.  That's a  
6 good question.  I think I would always put KW or  
7 Yasif on it.  Yasif was really good.

8           Q    Would you -- how frequently would you  
9 perform an inspection like walk the grounds to --

10          A    Absolutely.

11          Q    How often?

12          A    Every week.

13          Q    Once a week?

14          A    Once a week.

15          Q    Okay.  Would that include going up on the  
16 roofs to check those, or did you just walk the  
17 grounds?

18          A    No.  I'm scared of heights.  So I didn't go  
19 up on the roof.

20          Q    This once-a-week inspection that you did,  
21 was it just walking the grounds, or did you actually  
22 go inside rooms?

23          A    Go inside rooms.  We have to to make  
24 sure -- you know, check up under the beds, make sure  
25 the -- make sure that we don't have leaks.  Make

1       sure that there's nothing up under the bed.

2               If they come in there, the health  
3       department, with a white glove and you got dust on  
4       the headboards, you're going to get wrote up. So I  
5       made sure all of those things were good. No bad. I  
6       even -- I take that back.

7               I did do some repairs as far as the  
8       bathtubs. If we had a bathtub that was maybe  
9       showing a little age, I knew how to repair those  
10      myself. My brother taught me because he was  
11      maintenance at another hotel.

12             Q     When you would do your weekly inspections,  
13      would you go into every single room of the hotel?

14             A     I would pick about 10 rooms or 15 to go in.

15             Q     So you'd do a spot check?

16             A     Pretty much. But it still got done, but  
17      the housekeepers would report to me. I had a list  
18      that I drew up a spreadsheet for that they were to  
19      write down everything that they done.

20             And I had -- behind that sheet I had a  
21      maintenance report of anything that they found that  
22      needed maintenance that they would turn that in with  
23      their report, and therefore I would turn it in to KW  
24      and Yasif.

25             Q     And in the entire three or so years that

1       you were -- or approximately three years that you  
2       were with the Knights Inn, had there ever been the  
3       report -- or had there ever been a roof leak, even a  
4       small leak? Had there ever been one?

5             A     I never recall a leak.

6             Q     Okay. So are you saying it didn't happen  
7       or you just don't recall it?

8             A     Both. I don't recall it, and I'm sure that  
9       if it had happened, I would be notified and we would  
10      repair it.

11            Seems like one time I mentioned -- Yasif  
12      mentioned something to me, it was just one small  
13      area and we replaced a ceiling tile with it.

14            Q     Okay. And that's all you can remember as  
15      you sit here today?

16            A     Yes. As far as the roof leaking?

17            Q     Yeah.

18            A     Yes.

19            Q     So other than that one ceiling tile that  
20      had to be replaced, you don't recall during your  
21      entire time whether there were any prior roof leaks?

22            A     Yasif took care of all that, but if there  
23      were roof leaks, I would have been notified of it,  
24      and I would have went to Ms. Visram with it.

25            Q     Okay.

1 MR. CONCHIN: What was the question? Was  
2 it before the fire, before the wind? What was the  
3 time frame?

4 MR. TAYLOR: The entire time she was there.

5 MR. CONCHIN: Oh, okay. I think she may  
6 have misunderstood.

7 MR. TAYLOR: Well, that was my question,  
8 Gary.

9 MR. CONCHIN: Yeah. Thanks.

10 BY MR. TAYLOR:

11 Q Was there any outside service that the  
12 Knights Inn would hire -- and when I say "Knights  
13 Inn," I mean the whole thing, not just the one  
14 building.

15 I know you refer to the two buildings  
16 differently, but when I say it, unless I'm referring  
17 to the building itself, which I just mean the whole  
18 complex. All three buildings.

19 A Okay.

20 Q Did the Knights Inn ever bring in an  
21 outside company during your entire time as a manager  
22 to conduct inspections?

23 Let's do this. Before the fire occurred,  
24 did you ever -- was a third -- an outside  
25 third-party service ever brought in?

1           A    Absolutely.  I don't know their names, but  
2   this man and woman came out and done a thorough  
3   inspection before the fire.

4           Q    You don't remember their name?

5           A    It was a man and a woman.  I want to say  
6   they were a team.  Maybe a husband and wife.  I'm  
7   not sure.

8           Q    Before the fire?

9           A    Before the fire.  They came out and done a  
10  complete inspection because it was time for our  
11  insurance and stuff to be renewed.

12          Q    A man and woman who were husband and wife?

13          A    I'm assuming they were husband and wife.  
14  They acted like it.  Or they were very close  
15  colleagues.

16          Q    Okay.  Do you recall who sent them?

17          A    Chubb Insurance.

18          Q    You think Chubb sent them?

19          A    Or whoever we had our insurance with.

20          Q    Maybe the insurance agent?

21          A    All I know is they came and did an  
22  inspection, and they don't ever let you know.  They  
23  just catch you off guard, but we passed with flying  
24  colors, because I kept that hotel up better than --  
25  better than most people would have took the time and

1 effort to put in it as I did.

2 Q And you don't remember their names?

3 A If I tried to remember every contractor and  
4 every person's name that came in and out, I would  
5 have to keep a book, but no, I do not -- I just  
6 remember it was a man and a woman.

7 Q And you're not positive of who actually  
8 sent them?

9 A Whoever we had our insurance company --  
10 whoever we had our insurance with because we had to  
11 pass inspection so that they would renew our  
12 insurance.

13 Q Okay. Well, let me ask it this way.

14 Was it somebody that Chubb, who was the  
15 insurer, sent? Was it somebody that the agent sent?  
16 Was it some third party that came out? Do you know  
17 any of that?

18 A I would say it was Chubb who we had our  
19 insurance with.

20 Q Okay. So you think it was Chubb that sent  
21 them out?

22 A Yes.

23 Q But you don't remember their names?

24 A No.

25 Q Do you remember where they came from?

1           A    The insurance company.

2           Q    No. No. Where they came from  
3           geographically.

4           A    From whoever our insurance agent was is who  
5           sent them because our insurance was due and we had  
6           to pass inspection before we could get the  
7           insurance.

8           Q    Ma'am, we're --

9           A    Well, you're trying to put words in my  
10          mouth. I feel like --

11          Q    No, I'm not. When I say do you know where  
12          they came from, I meant like whether they come  
13          Birmingham. Did they come from Montgomery, do you  
14          know?

15          A    Their mother's womb.

16          Q    Do you know where they came from?

17          A    I'm going stick with I think they came from  
18          whoever we had our insurance with. It had to be  
19          with Chubb Insurance because -- Wayne, let me  
20          finish.

21                    Because in order to have the insurance for  
22          the hotel, you have to pass an inspection.

23          Q    Okay. That's fair. My question, though,  
24          is do you know where they came from, i.e., did they  
25          come from Atlanta? Did they come from Birmingham?

1 Did they come from Montgomery? Where were they  
2 from, not who sent them?

3 A Specifically, since you've narrowed it down  
4 where understand it, I do not know, and they did not  
5 tell me.

6 Q Okay.

7 A They just were there for an inspection so  
8 that we could review our insurance.

9 Q How long -- when -- approximately when was  
10 this?

11 A Maybe in February before the fire.

12 Q So about a month before the fire?

13 A Yes.

14 Q So that would have been February of 2014  
15 you think they might have come out?

16 A I'm assuming, give or take a month, you  
17 know, but it was before the fire.

18 Q Okay. Any other inspections by some  
19 outside third party of the hotel from the time you  
20 were hired on as the general manager up until the  
21 time of the fire?

22 A What kind of inspections?

23 Q Any kind of inspection of the buildings,  
24 the interiors?

25 A The fire marshal, Michael Brannon, and he

1 gave me a list of things to do, and he will verify  
2 with you every two weeks he would come back and  
3 every two weeks I would have it taken care of.  
4 After I left, I do not know what happened.

5 Q Let me show you what has been marked as  
6 Exhibit 86 for identification.

7 (Defendant's Exhibit 86 was marked  
8 for identification.)

9 BY MR. TAYLOR:

10 Q And this is a letter dated August 9, 2013  
11 to the Knights Inn from the City of Bessemer Fire  
12 Department, Chief Michael --

13 A Brannon.

14 Q -- Brannon.

15 Do you recall seeing this letter before?

16 Actually, I want to point out, on the front  
17 page it does say "Attention Sheila."

18 A This is a follow-up letter when he first  
19 came out and told me the things that needed done,  
20 and I asked him could he work with me on giving me a  
21 list and let me have it done in two weeks.

22 So this is a follow-up. This is what he  
23 had -- this is specifically what he asked me to do.  
24 I had to get new fire extinguishers in locked -- in  
25 a glass container.

1           There was -- whatever's in here is what he  
2       asked me to do. As a follow-up letter, he sent this  
3       to me to see if I was going to work with him and do  
4       it.

5           When he came back out, I had everything  
6       done, and then he gave me another list. And that's  
7       how I worked with him.

8           Q    Okay. So you did receive this letter?

9           A    Yes. I did receive this letter as a  
10       follow-up to our agreement.

11          Q    And he listed 11 things that needed to be  
12       taken care of in this letter?

13          A    Over a period of time. Over a period of  
14       time. Every two weeks he would come back out and  
15       every two weeks I would have it -- what he put on  
16       the list.

17          Q    This letter, though, had 11 items in it; is  
18       that right?

19          A    I remember doing the fire extinguishers  
20       first. I remember doing that first.

21          Q    What about the electrical? Was that taken  
22       care of?

23          A    Outlets and switches are missing. Yes,  
24       that was taken care of.

25          Q    Okay. And there were three items on there

1 under "Electrical" that needed to be taken care of.

2 And that got taken care of right away?

3 A Yasif took care of that.

4 Q Okay. But you made sure it got done?

5 A I made sure it got done. Because he made  
6 it quite clear, if I didn't get it done, he'd shut  
7 me down.

8 Q Okay. And then the next item is under  
9 "Egress," there were two items. Were both of those  
10 taken care of right away?

11 A Where are you looking at?

12 Q The second page.

13 A Okay. Yes. Yes. I bought all new exit  
14 lights and put those up.

15 Q So that was all done right away?

16 A Yeah. Because I remember how expensive  
17 they were. Every two weeks -- mind you, now, keep  
18 that in mind -- he would give me things to do. I  
19 did the fire extinguishers. He'd come back two more  
20 weeks, did the exit lights. Come back in two more  
21 weeks, he would have another list. And we were up  
22 to standards with him.

23 He was completely satisfied with the  
24 working relationship that we had because I did what  
25 he asked me to do.

1           Q    Okay.  Let's go back to the first page and  
2   review.  So we got -- you had to buy some new fire  
3   extinguishers; right?

4           A    Yeah.

5           Q    And then you -- they needed to be  
6   unobstructed.  In other words, access that was  
7   unobstructed; right?  That was Item No. 2 on this  
8   letter; right?

9           A    Yes.  We had to put them in a glass case  
10  with a key.

11          Q    Okay.  And there had to be signs marking  
12  where they were located?

13          A    Yes.

14          Q    And you took care of that?

15          A    Yes.

16          Q    And then he indicated where they could be  
17  located on --

18          A    Well, they had to be a maximum distance.

19          Q    Right.  And you made sure that no fire  
20  extinguisher was more than 75 feet from the next  
21  one; is that right?

22          A    Yasif took care of that, but I made sure he  
23  understood that the fire marshal's request was very  
24  stern.

25          Q    Very good.  And then under "Electrical" it

1 says the second floor storage room has improper  
2 wiring.

3 That was taken care of?

4 A Yasif took care of that, and I'm sure  
5 Mr. Brannon checked it when he came back because I  
6 remember him -- I just remember him saying a remark  
7 about the electrical.

8 Q And then outlets and switches are missing  
9 covers in different areas.

10 You took care of that?

11 A Yes.

12 Q And then the breaker panels and several of  
13 the rooms have gaps or improper covers.

14 Was that taken care of?

15 A That would have been something that Yasif  
16 would have taken care of, but if it wasn't taken  
17 care of, when Mr. Brannon came back in two weeks, he  
18 would have let me know, and I would have made sure  
19 myself specifically that it got done.

20 But Yasif was very, very good. He was very  
21 dedicated to helping me keep everything up.

22 And then, like I said, he wanted new exit  
23 lights. Some of our exits lights weren't working.  
24 They were exit lights but they weren't on.

25 Q Like the emergency lights?

1 A Yes.

2 Q Okay. That's under "Egress"; right?

3 A Yes.

4 Q That's the first item that we're talking  
5 about?

6 A Yes. And I did get those fixed.

7 Q Okay. And then the second item under  
8 "Egress," (as read):

9 "Improper locking devices  
10 in the exit doors in the banquet  
11 area and the rear area of the  
12 lobby."

13 Do you see that under Item 2?

14 A I'm looking. I don't remember doing that.  
15 Unless Yasif took care of it where the lounge was  
16 and the banquet room to do with the locks. I  
17 wouldn't -- I don't remember specifically him giving  
18 me something of that to do.

19 Q And then, finally, we've got three items  
20 under "Storage."

21 Were all of those taken care of?

22 A Yes. We even had to move the lawn mowers  
23 and everything outside.

24 Q Because they were kept in the office and in  
25 the lobby?

1           A    In the lounge that we use -- I told you we  
2    used that as a storage room. He did not want them  
3    inside. So we put them outside in a storage  
4    building that we cleaned out and had -- we kept --  
5    started keeping all that in there.

6           Q    Okay.

7           A    But the reason we kept it stored, we just  
8    didn't want to leave it out, you know, for theft  
9    purposes.

10          Q    And then there was a -- also there's a  
11    portable propane tank that he saw that had to be  
12    taken outside. That went into that same storage  
13    area?

14          A    Yes.

15          Q    And then he just generally says (as read):

16                       "The storage of other  
17                       materials throughout the property is  
18                       improper."

19                       Under Item 3. That was all corrected?

20          A    Yes. He made sure. It was a room he found  
21    that -- it wasn't my room of storage, it was Ms. V's  
22    because she like to keep all her records and stuff  
23    like that in it, but I had to tell her we had to do  
24    away with that. And so we cleaned it out and he  
25    reinspected that.

1 Q Okay. Other than the fire department  
2 coming out and the man and woman that you think were  
3 from the insurance company that came out --

4 A No. I know they were from the insurance  
5 company.

6 Q Okay. The man and woman that were from the  
7 insurance company and then the fire department  
8 coming out, did Haman hire anyone to come out? And  
9 when I say "Haman," that's the Knights Inn,  
10 Ms. Visram.

11 Did Knights Inn hire anyone to come out and  
12 conduct any inspections of the property?

13 A After the fire or before the fire?

14 Q Before the fire.

15 A No. We would have no reason to do that.  
16 The fire marshal was pretty much in charge.

17 Q Okay. So you don't recall that -- Knights  
18 Inn ever hiring anyone?

19 A I know that it didn't happen because I was  
20 there 24/7, and the fire marshal is the first one  
21 that I started working with. He's the one that gave  
22 me the list of everything that I needed to do.

23 Q Before the fire, were you aware of any  
24 other insurance claims that had ever been submitted  
25 in connection with damage to the property?

1           A    No, sir.

2           Q    Did Mr. Parker report to you or did he  
3 report to Mr. Bukhari?

4           A    Both.

5           Q    So if you became aware of something, rather  
6 than having Mr. Bukhari handle it, you would just go  
7 directly to Mr. Parker?

8           A    Yes.

9           Q    Did Mr. Parker perform regular inspections  
10 to make sure that everything was in order, or did he  
11 just respond to maintenance calls?

12          A    No. He done his own inspections to make  
13 sure everything was going like it should be or any  
14 new problems that we had or whatever.

15          Q    Do you know where Mr. Parker is now?

16          A    I have no clue.

17          Q    Do you know where he came from?

18          A    I have -- that, I don't know.

19          Q    How long after you became the general  
20 manager did you hire Mr. Parker?

21          A    It wasn't very long because the maintenance  
22 person that we had wasn't working out for me. So I  
23 was doing interviews for maintenance, and he  
24 responded.

25               And most of the employees that I would

1 hire -- I didn't have a whole lot of money to do  
2 advertising -- was they would walk through the door,  
3 and I would get them to fill out a résumé and then I  
4 would talk with them, and I would either hire them  
5 or not.

6 And he was -- he responded to something, a  
7 flyer, maybe, I put out or something, because with  
8 our marketing, we would do flyers, and I believe he  
9 responded to one of those and his qualifications  
10 were good.

11 Q Okay. And then Mr. Parker was still there  
12 by the time you had left?

13 A Yes.

14 Q When I say "left," I meant left employment  
15 of the Knights Inn; is that right?

16 A Yes.

17 Q Whenever there was any kind of maintenance  
18 work to be performed or any repairs that needed to  
19 be performed, would there be any paperwork that was  
20 generated to document it?

21 A Yes. Well, like I told you, on the back of  
22 the sheet of the housekeepers, they would -- if they  
23 found anything wrong with maintenance, they would  
24 attach it to the back of their housekeeping sheet  
25 which was turned into me.

1 I therefore turned it into maintenance.  
2 Maintenance repaired it. Told me what all they did  
3 and turned it back into me, and I kept them in a  
4 file.

5 Q And then once it got too full in the office  
6 in the file cabinet, those would be put into boxes  
7 and moved to the Studio Inn?

8 THE VIDEOGRAPHER: Counsel.

9 THE DEPONENT: No.

10 MR. TAYLOR: Gary, I don't know -- well,  
11 let's -- both of you have lost the audio. Okay.  
12 They both lost because I just got a text also  
13 from --

14 THE VIDEOGRAPHER: Maybe we can go off the  
15 record.

16 MR. TAYLOR: Yeah. Let's go off the  
17 record.

18 THE VIDEOGRAPHER: We're going off the  
19 record. This is the end of media unit three. The  
20 time is 10:52 a.m.

21 (Recess.)

22 THE VIDEOGRAPHER: We're going back on the  
23 record. This is the beginning of media unit four.  
24 The time is 11:00 a.m.

25 ///

1 BY MR. TAYLOR:

2 Q Ms. Allen, during your time as the general  
3 manager at the Knights Inn, were you aware of any  
4 repairs that were made to the roofs during your  
5 tenure, even patch repairs?

6 A My understanding, it was a new roof. I  
7 shouldn't have had any problems with it, or it  
8 wasn't that old.

9 Q Okay. So you're not aware of any prior  
10 repairs?

11 A I'm not aware of any prior repairs done to  
12 the roof. I just overheard Ms. V. talking to  
13 somebody once, you know, that the roof wasn't  
14 that -- that the roof wasn't that old. It wasn't  
15 out of warranty or something.

16 You know, I'm not really sure. Like I  
17 said, I'm scared of heights. I didn't keep up with  
18 the roof. Yasif was doing all of that. Unless  
19 there was a leak internally, then I would let him  
20 know, and he would take it from there.

21 Q Were you working on the day that the fire  
22 occurred, which I believe was March 22nd, 2014?

23 A Yes.

24 Q Okay. Where were you?

25 A I was at Mrs. Visram's house. I was -- she

1 doesn't drive, and I was to take her to Atlanta.  
2 That was part of my job was to take her to doctor's  
3 appointments and drive her where she needed to go.

4 So I was to take her to Atlanta, Georgia  
5 the next morning.

6 Q Had you all left to go to Atlanta --

7 A No.

8 Q Let me finish my question before you  
9 answer.

10 Had you left for Atlanta by the time you  
11 learned about the fire?

12 A No.

13 Q Okay. I take it, then, you did not drive  
14 to Atlanta?

15 A No.

16 Q What did you as soon as you were notified  
17 about the fire?

18 A I came straight back to the hotel and  
19 started, you know, getting everybody out of the way,  
20 making sure everybody was safe and watching them put  
21 the fire out, pretty much.

22 Q What time of day was it that you were  
23 called about the fire?

24 A It was at nighttime, actually.

25 Q Had you already gone to bed?

1           A    I'm going to say anywhere between 10:00 and  
2   12:00, maybe.

3           Q    In the evening?

4           A    At nighttime, p.m.

5           Q    And you were supposed to be leaving for  
6   Atlanta the following morning?

7                   That's a "yes"?

8           A    Yes. Yes, sir.

9           Q    Got it. Thank you.

10                   Do you know what time the fire actually  
11   occurred?

12           A    Again, I think between 10:00 and midnight.  
13   Let's just go with 9:30.

14           Q    So you think you were called that quickly  
15   after it occurred?

16           A    Yes. I mean, they were calling me, telling  
17   me what happened. That was their job.

18           Q    Who called you?

19           A    Whoever was working the front desk would  
20   have been the person to call me because they would  
21   have been the person that saw everything going on  
22   with the fire trucks and everything, and I don't  
23   remember who was working that night or who called  
24   me.

25           Q    Okay. Who called the fire department?

1           A    I don't know that either. I never even  
2           knew -- I never even knew how the fire got started.  
3           Nobody ever even gave me an answer to how the fire  
4           got started.

5           Q    That was my next question.  
6                   What caused the fire?

7           A    I don't know.

8           Q    Okay.

9           A    Michael's thing was he thought maybe it was  
10          just a homeless person or somebody that had  
11          vandalized a room or whatever. That was his theory.

12          Q    Michael?

13          A    Brannon. Squatters. I never heard that  
14          word before, but that's what he called them.

15          Q    Did you have squatters?

16          A    No. That's why I didn't know what it was  
17          when he mentioned that to me.

18          Q    Do you know what a squatter is now?

19          A    Yes. We -- we had security at the hotel.  
20          My son did security there. He's 6, 3 and 240  
21          pounds, and he was good friends with all the police  
22          officers there. They wanted him to become a police  
23          officer.

24                   But he did -- at nighttime we had security.  
25          Pretty much we could take care of it during the day,

1 but he did security there.

2 Q Which son was it that security?

3 A The one that's 30 years old. He was  
4 younger then. He did security. And turned in a  
5 report every night. If he went by a room, for  
6 example -- he made sure that there were no  
7 suspicious people on the property, but if he went by  
8 a room that was on a list that he had to go by and  
9 the lights were on and the curtains were pulled when  
10 they're not supposed to be.

11 See, all the rooms that aren't rented, the  
12 curtains stay open. So if he went by a room, he  
13 would knock on the door and ask for their receipt.  
14 So then you got a front desk person giving a friend  
15 a night.

16 He would bring them down. We would call  
17 the police and take it from there. So he did -- he  
18 did a good job doing security.

19 Q And that was Rickey?

20 A Yes.

21 Q Did you conduct -- so when you got the  
22 call, did you immediately drive back?

23 A Yes. Right then.

24 Q And did you -- I guess the following  
25 morning, did you walk all of the units of the

1 building where the fire occurred to take a look at  
2 the damage?

3 A I went in the room itself, as far as -- you  
4 know, I didn't know the severity of the damage. So  
5 I didn't do that myself. I told Ms. V., you know,  
6 and I talked to Michael Brannon, but I honestly had  
7 never been in a situation like that, and I didn't  
8 know what the hazardous of it was to do that.

9 So I let Ms. V. know and that's when she  
10 sent the insurance adjuster out there, and that's  
11 where we started with, I think, Brent Parrish.

12 Q In what room did the fire start?

13 A It was middle ways of the back side of the  
14 hotel. You know, that's been so long ago. I can't  
15 give you on accurate number of the room because it  
16 was on the back side, and I didn't -- I mean, if you  
17 gave me numbers to pick from, I'm sure I can tell  
18 you, but at this point, no, I don't know the number  
19 of the room. It's been a long time ago.

20 Q Okay. I know you couldn't remember how  
21 many rooms -- this was to the Studio Inn building;  
22 right?

23 A Yes.

24 Q And I know you don't remember exactly how  
25 many rooms the Studio Inn building had, but did you

1 go ultimately into every room in the Studio Inn any  
2 time after the fire to determine whether it was  
3 damaged by fire?

4 A I did what Brent Parrish asked me to do.  
5 That's when I went in and -- the contents and made  
6 up the spreadsheet that he sent me, and I did what  
7 he had asked me to do.

8 Q Did you go into every single room --

9 A Every single room.

10 Q -- in the Studio Inn?

11 A Every single room.

12 Q So you went into every single room of the  
13 Studio Inn in order to prepare the contents  
14 inventory that we have marked as Exhibit 85 for  
15 identification?

16 A As to the rooms that I thought were  
17 damaged.

18 Q Okay.

19 A I mean, I didn't know it was going to  
20 affect every room over there. I thought, you know,  
21 that just maybe the rooms next to it and the room,  
22 you know, upstairs and downstairs, but I had no clue  
23 that smoke could travel like that and do that much  
24 damage.

25 Q Who told you that that happened?

1           A    The -- when I sent Brent back that, then  
2   Ms. V. took it over and she had someone else come  
3   out there.

4           Q    Do you recall who that was?

5           A    Well, it was still with our -- I guess our  
6   insurance company. The insurance company that we  
7   were using is the one that said that we had smoke  
8   damage. I had just done the contents. He said --  
9   he's the one that said that we had -- and it was a  
10   he -- that we had smoke damage in the majority of  
11   the hotel.

12          Q    Okay. Do you remember this person's name?

13          A    It was with the insurance company that we  
14   had.

15          Q    Do you remember his name?

16          A    All I know is my conversations was with  
17   Brent Parrish. So whoever he sent out there, if not  
18   himself. He might have been the one that came out  
19   there. I'm not sure.

20          Q    Okay. And they're the ones that told you  
21   that smoke had damaged most or all of the rooms in  
22   the building?

23          A    That, quote, "There's a lot of smoke  
24   damage."

25          Q    Okay. Can you describe this person for me?

1           A    Tall, maybe skinny, brownish/black hair.

2           Q    When you say "tall," how tall are we  
3   talking about? I mean, your son Rickey, you said,  
4   was six foot three?

5           A    Yeah. He wasn't -- wasn't quite that.

6           Q    So was he six foot three? Was he --

7           A    Maybe he's six foot one.

8           Q    So shorter than your son. Do you remember  
9   where he came from geographically?

10                   Did he come from Atlanta, Birmingham? Did  
11   he come from Nashville, Tennessee; do you know?

12           A    He come from the headquarters of Chubb  
13   Insurance adjuster.

14           Q    Do you know where that is? Are you  
15   guessing or do you know?

16           A    No. It was in -- it was -- it was close  
17   enough we kept in touch with each other on a  
18   daily -- pretty much on a daily basis, Brent and I.

19           Q    I'm not talking about Brent. I'm talking  
20   about the person you talked to out there that told  
21   you about the smoke damage. Where did he come from?

22           A    Well, it's not, Mr. Taylor walked up and  
23   said I'm so-and-so. I'm from this address or  
24   whatever. They just say, you know, "I'm here to" --  
25   you know, I'm -- their name, and "I'm here to do an

1 estimate on your fire damage."

2 Q Was it one of the people that was hired to  
3 do an estimate?

4 A It wasn't from us. It was from the  
5 insurance company that we had. I wouldn't just get  
6 somebody to come out there and give an estimate.

7 My job was to report it to the insurance  
8 company, to Ms. V., and then the insurance company,  
9 and let them take it from there.

10 Q Did this person give you a business card?

11 A I'm sure he probably did.

12 Q What would you have done -- when people  
13 come out to do an inspection, they give you a  
14 business card, what would you do with them?

15 A I would keep them on my desk in a little  
16 card thing that I had, but I was one on one with  
17 Brent. So it possibly was maybe somebody he sent.

18 Q Okay.

19 A If not him himself, but I don't ever  
20 remember meeting him in person. I just remember  
21 talking with him and you saw the fax going back and  
22 forth.

23 Q Did you ever meet with a man -- have you  
24 ever heard of a company called Forensic Building  
25 Science? Is that a yes or a no? I need you a

1 verbal response. I'm sorry.

2 A I'm concentrating. I'm thinking -- you got  
3 me -- Forensic Files is one of my favorite movies.  
4 You got me thrown off a minute.

5 No. Nobody ever talked to me from that  
6 business.

7 Q How about The Howard Group?

8 A No.

9 Q How about Young & Associates?

10 A No.

11 Q How about Belfor?

12 A Belfor? No. I mean, Mrs. Visram took it  
13 over after Brent and I -- we couldn't -- we couldn't  
14 get on the same page, you know. I needed money, and  
15 he wasn't doing it fast enough for me.

16 My hotel was going under, and then it got  
17 shut down which caused me a lot of money damage. I  
18 had to let some -- a lot of revenue, you know -- and  
19 I remember having to let employees go that I didn't  
20 want to let go, but I have not talked with anyone  
21 after Ms. Visram took it over.

22 Q Was the hotel still operating when you left  
23 the employ of Knights Inn?

24 A Oh, absolutely.

25 Q So it's still going on. It hadn't been

1 shut down by anybody?

2 A No. Just -- I mean, the Studio Inn had  
3 been shut down.

4 Q Right. Because of the fire?

5 A But my hands were tied. I could not get  
6 any money. I could not get any money to fix  
7 anything with.

8 Q But the Knights Inn building was still  
9 operational?

10 A The Knights Inn building was still  
11 operational.

12 Q Okay. And you left in February or --  
13 excuse me, April 2015?

14 A Yes.

15 Q So at least through April 2015, the Knights  
16 Inn building was still operational?

17 A Everything was -- everything was --  
18 everything was operational. I do remember telling  
19 Yasif before -- I do remember telling Yasif before I  
20 left that I had a leak in the office right up over  
21 where my computer was at.

22 And that was very dangerous because it if  
23 let -- if it shorted out my system, then I would  
24 have been in a lot of trouble with losing all the  
25 records and everything. And maybe that's the time

1 he replaced the ceiling tile.

2 Q Okay. How long was that before you left in  
3 April 2015 that this occurred?

4 A This happened in -- it happened the week I  
5 left.

6 Q Okay. So right before you left, there was  
7 a leak in your office?

8 A In the lobby. In the lobby.

9 Q Okay. Is that the first report of a leak  
10 in that building was the week that you left?

11 A That's the first report that I made.

12 Q Are you aware of any other leaks in that  
13 building before you left?

14 A No. Honestly, Mr. Taylor -- and I don't  
15 like bring it up again -- my thoughts were, you  
16 know, getting home to any family, and I had to  
17 leave. And I loved my job. I had to leave.

18 Q I understand.

19 Have you ever dealt with or met a person --  
20 well, let me ask it this way. Have you heard the  
21 name Arthur Grandinetti?

22 A No.

23 Q Have you met Arthur Grandinetti?

24 A No.

25 Q Have you heard the name Sarah Grandinetti?

1 A No. I mean, Sarah comes up but --

2 Q I take it that means you never met Sarah  
3 Grandinetti?

4 A Seems like I saw Sarah --

5 Q There was the same Sarah in one of the  
6 letters, but other than that --

7 A No. Those two -- those last names would  
8 have stuck with me --

9 Q Okay.

10 A -- as being like an Italian name or  
11 something.

12 Q So you don't recall ever meeting somebody  
13 with --

14 A I do not recall anybody with that last  
15 name.

16 Q Do you ever recall meeting them?

17 A Maybe that was the man and woman that came  
18 out. Maybe that was their -- maybe they didn't give  
19 me their last name.

20 Q Okay. Do you remember their first names,  
21 the two that you said came out from the insurance  
22 company?

23 A I'm sorry. It's just been a long time.  
24 I'm not good with names that long ago. I just know  
25 that everybody was like, oh, "They're here for

1 inspection." I said, "And I'm not worry because I  
2 kept the hotel up to standards."

3 Q Gotcha.

4 What let me ask you a little bit about the  
5 Knights Inn. Had there been any reports of leaks in  
6 the Knights Inn building up to the time that you  
7 left in April 2015?

8 A I reported the leak in the -- I reported  
9 the leak in the lobby. Of course I can't have a  
10 leak in the lobby. And that was within -- within  
11 the two weeks that I was getting ready to leave. I  
12 already knew that I was ready to leave. I just  
13 couldn't take it there anymore due to the tragedy in  
14 my family.

15 So I want to say -- I didn't see it, but I  
16 want to say that I heard Yasif say that he had  
17 repaired -- during the same time that I found the  
18 leak in the office, that he had repaired one in the  
19 ballroom.

20 Q Okay. So other than you think a repair to  
21 a leak in the ballroom and then the leak in the  
22 office around the time that you left in April 2015,  
23 are you aware of any other leaks in that building,  
24 what I'll call "the office building," up until the  
25 time that you left?

1           A    No, sir.  What happened after I left, I  
2   don't know, but with those leaks, it was important.  
3   It was there in the lobby.

4           Q    I know.  I'm talking up until the lime you  
5   left.  Other than those two leaks that you've  
6   identified, had you identified any over leaks?

7           A    No.

8           Q    Were you aware of any other leaks in that  
9   building --

10          A    No.

11          Q    -- up until the time you left?

12          A    No.

13          Q    What about in the Knights Inn building?  
14   The build where you lived, where you had your  
15   room --

16          A    No.

17          Q    -- were you aware of any leaks in that  
18   building up until the time that you left in April  
19   2015?

20          A    No.  That's where -- that's where my  
21   inspection comes in that I would do myself with the  
22   rooms and the housekeepers and the maintenance.  If  
23   there was anything like that going on, I would have  
24   been notified.

25          Q    So up until the time that you left, were

1       you aware of any roof damage --

2             A     No.

3             Q     -- to any of the buildings other than maybe  
4       what was caused by fire?

5             A     They would never say to me that -- I mean,  
6       Brent never mentioned that the roof was damaged from  
7       the fire.

8             Q     Okay. Fair enough.

9                    Are you aware of any roof damage to any of  
10       the three buildings as of the time that you left in  
11       April 2015?

12            A     No.

13            Q     Ms. Allen, let me show you what I have  
14       marked as Defendant's Exhibit 87 for identification.  
15       It's a four-page document dated June 2014 from a  
16       company called Brookstone Restoration.

17                    (Defendant's Exhibit 87 was marked  
18       for identification.)

19       BY MR. TAYLOR:

20            Q     And I recall -- well, first of all, have  
21       you ever seen this document before?

22            A     This is the people that I had come out and  
23       give me an estimate of the structure.

24            Q     So this is --

25            A     I never authorized them to do any of this.

1 It was to only fix the structure to keep me from  
2 being shut down by the fire marshal.

3 Q Okay. You did not ask for --

4 A No. I did not --

5 Q This is just an estimate. This is just  
6 estimate.

7 A No. I guess they done that on their own  
8 saying they wanted that job, and all I wanted them  
9 to do is to come out there and do the structure  
10 because the fire marshal made it clear if I didn't  
11 get it done, I was going to get shut down.

12 Q Okay. Have you ever seen this document  
13 before, this estimate?

14 A You know, this wouldn't even coincide with  
15 anything I had going on. I mean, they may have  
16 taken it upon themselves to do an estimate, but all  
17 I had them come out there and do was the structure.

18 Q An estimate to repair the structure?

19 A Yes. That was it. That was it. Just the  
20 structure only because that's the first thing the  
21 fire marshal told me to do.

22 Q Okay. And this estimate, it's dated June  
23 30, 2014; right?

24 Is that what it says on the front?

25 A Yes.

1           Q   And you were still the manager of the hotel  
2   at that time?

3           A   Yes.

4           Q   And then this is addressed to you; is that  
5   right?

6           A   Yeah. All that's correct.

7           Q   Okay. And this company -- Brookstone  
8   Restoration, this company, that was called by you?

9           A   For the structural damage.

10          Q   I understand. I'm just trying to  
11   understand whether you called this company out or  
12   did the insurance company call this company out?

13          A   I want to say that I did for the structural  
14   damage only, nothing -- nothing else, just -- that  
15   was my main priority to get the structure repaired  
16   to keep the hotel open.

17          Q   Okay. And how do you define structure?  
18   What does that mean to you when you say that?

19          A   The steel beams that hold the hotel  
20   together that are on the ceiling and they're on the  
21   walls. The steel beams. And, see, we had steel  
22   beams running across in front of the hotel.

23                You know, like out front, every door you  
24   walk out where there's steel beams, but these steel  
25   beams that were up there, it was going to cave.

1           And that's what Michael Brannon told me to  
2     get repaired first because that was very, very  
3     hazardous.

4           And so that's what I called them out for,  
5     and then they come back with all of this. There was  
6     a miscommunication somewhere.

7           They were just to give me an estimate on  
8     the structure and start repairs -- and start repairs  
9     on that, but then again, I'm having to refer this to  
10    Ms. V., and I need money for it.

11          Q     I understand. So this estimate that you  
12    gave is broader than what you actually asked them to  
13    do; is that what you're saying?

14          A     Yeah. I mean, I just needed the structural  
15    damage from them. I did not ask them for any of  
16    this. Just the structural damage.

17          Q     Okay. And I'm glad you pointed that out,  
18    because I got to be honest with you, when I look at  
19    what this is, to me this is all structural damage,  
20    but what you mean by "structural damage," you mean  
21    just the steel?

22          A     Just the steel. Because it could collapse  
23    on somebody and we would have a possible death if  
24    that had happened.

25          Q     Do you remember receiving this estimate

1       that's from Brookstone Restoration?

2           A     I do not remember receiving this. I don't  
3       even remember them getting back with me with  
4       anything to do with the structure. I mean, I don't  
5       remember them getting back with me at all.

6           Q     Okay. But it is addressed to you, isn't  
7       it?

8           A     It is, but that don't mean I always get all  
9       my mail either from there.

10          Q     And on the back page they've given you an  
11       estimate to repair all of the exterior fire damages  
12       in the amount of just under \$349,000.

13                Is that what that says?

14          A     That is what that says, but I never -- I  
15       never approved anything or got any of this from them  
16       at all. I mean, we didn't have any mold.

17          Q     There was no mold in the fire damaged  
18       building?

19          A     No. I didn't have any mold over there.  
20       The health department would have probably shut me  
21       down if I had.

22                Anytime I had any complaint from a guest  
23       that come to me, I always took care of it. If they  
24       went to the health department, he would come to me  
25       and I would take care of it, but I don't remember --

1 I don't remember having any mold. I don't know  
2 where he come up with that.

3 All of this, it looks good on paper but --  
4 and it seems like it's detailed, but they were only  
5 out there for the steel beams.

6 Q Okay. So you called them, asked them to  
7 give you an estimate to repair the steel beams, and  
8 what they did is they gave you an estimate that was  
9 more than the steel beams, more than you asked for?

10 A Yeah. Yeah. They didn't even put an  
11 estimate here on the steel beams that I see.

12 Q Well, if you look on the second page,  
13 "structural steel."

14 Do you see that? "Metal framing."

15 Do you see that about halfway down the  
16 second page?

17 A I believe 270 was above the room that  
18 started. So that would have probably been 170,  
19 maybe. That's what I wanted him -- that's what I  
20 gave -- that's what I wanted him to come out and  
21 give me an estimate on.

22 Q So you wanted an estimate that's what's  
23 called here 5000-structural steel and then the next  
24 item, "metal framing."

25 Those are the two things you wanted the

1 estimate for?

2 A Yes.

3 Q And everything else was more than what you  
4 asked for?

5 A I didn't ask for any of that because I  
6 wasn't authorized to the insurance company. Ms. V.  
7 and the insurance company was going to take it from  
8 there.

9 Q Let me show you -- actually, bear with me a  
10 minute.

11 I'm not going to mark this at this point.  
12 I want to just ask you if you ever -- here's an  
13 estimate here from a company called BBMK  
14 Contracting.

15 Have you ever heard of them before?

16 A It wouldn't be anybody that I hired.

17 Q Okay. So have you ever seen that estimate  
18 before that I just handed you?

19 A I don't even know what it is or who it's  
20 from.

21 Q Okay. So you've never heard of that  
22 company?

23 A No.

24 Q Thank you.

25 A Not while I was there. That don't have my

1 name addressed to it, does it?

2 Q No, it does not, ma'am.

3 A Okay. Thank you.

4 Q Do you know how BBMK ended up out on the  
5 property?

6 A No.

7 Q Okay.

8 A I mean, I'm just -- the name doesn't sound  
9 familiar. Can you break it down like -- BB, what  
10 that stands for?

11 Q Well, ma'am, I would if I could, but I  
12 think that is actually the name of the company is  
13 BBMK Contracting. So...

14 A I don't remember anybody coming there while  
15 I was there. Like I said, Mr. Taylor, at a point  
16 when I could not get any progress going with Brent  
17 Parrish, Ms. V. took it over.

18 That's why I guess she said in that letter  
19 she didn't feel like I was doing enough, and I was  
20 harassing the man to death.

21 Q When you called Brookstone Restoration to  
22 come out, how did you find them?

23 A Seems like they were referred to me by  
24 somebody that knew about the fire and they referred  
25 theirselves. Just came through the doors.

1           Q    Okay.  Wasn't recommended by Mr. Parrish,  
2   was it?

3           A    Well, no.  Mr. Parrish -- the reason I say  
4   no is because he was interested in the fire damage,  
5   not realizing that the fire marshal was focusing on  
6   the steel beams.  You understand?

7                    So I don't -- I don't think he did.  I  
8   didn't and he didn't either.

9           Q    Other than the bid for the steel beams and  
10   the metal framing that you wanted Brookstone  
11   Restoration to provide to you, did you solicit any  
12   other estimates or bids to repair the damages as a  
13   result of the fire?

14          A    I had been talking to some people about it.  
15   I was trying to get a friend of mine to come out of  
16   Troy, Alabama to do it, but he said the job was too  
17   big for him to do.

18                   I had started trying myself just to work on  
19   it little as I could, room by room, until, you know,  
20   I just I ran out of money.  I couldn't do anything  
21   without any money.

22                   But as far as having somebody come on the  
23   site for me to give an estimate, no, I did not.

24          Q    Have you ever seen an estimate of repair of  
25   the fire damage prepared by an Arthur Grandinetti?

1           A    No.

2           Q    Have you ever seen any contents inventories  
3   for the fire damage prepared by Sarah Grandinetti?

4           A    No.

5                   Is that the two people that would have been  
6   on the property that day checking the inspection  
7   part?

8           Q    I can't answer that, ma'am, because I don't  
9   know the answer to that.

10          A    Okay.

11          Q    I suspect not, but I really don't know one  
12   way or the other.

13                  Did you ask Mr. Parker to perform any  
14   repairs of the fire damages?

15          A    Yes.

16          Q    Was that part and parcel of his work, his  
17   salaried work, as the maintenance man --

18          A    No.

19          Q    -- or was this going to be extra --

20          A    Totally --

21                  DEPOSITION REPORTER:  If you can wait --  
22   you keep cutting him off at the end of his  
23   questions.  So if you could just take a pause before  
24   you start answering, it would --

25                  THE DEPONENT:  Well, he's a fast talker.

1                   DEPOSITION REPORTER: So are you. So I'm  
2 not going to be able to get both of you at the same  
3 time. Thank you.

4                   THE DEPONENT: Well, maybe we can just end  
5 this right now and then you don't have to hear me  
6 speak at all. How about that?

7 BY MR. TAYLOR:

8                   Q I would love to, ma'am, but unfortunately  
9 your testimony is important to the case --

10                  A Okay.

11                  Q -- we do need to get it finished.

12                         So the work that Mr. Parker was going to do  
13 was going to be extra in addition to his normal  
14 maintenance duties and he would be paid extra?

15                  A Yes.

16                  Q Okay. And was Mr. Parker actually hired to  
17 do some repair work of the fire?

18                  A No. It was just between me and him. I  
19 asked him could he do what I needed done and I would  
20 pay him a certain amount. I don't even remember  
21 what that was.

22                         He put new -- I bought the carpet. I  
23 bought the new ceiling tiles. I bought the paint.  
24 Took some furniture out of the Knights Inn, and we  
25 got up to three rooms before I couldn't even afford

1 him anymore.

2 I mean, because I was having to buy the  
3 materials. He was just doing the labor. But I knew  
4 what we needed from there.

5 Q So he had repaired three of the rooms?

6 A Uh-huh.

7 Q That's a "yes"?

8 A Yes, sir.

9 Q What -- what three rooms did Mr. Parker  
10 repair?

11 A It was on the top floor. I don't know  
12 what -- let's see, if that was 170 -- if you're at  
13 the top of the stairs at the Studio Inn, you're  
14 going be -- we started with the first three that  
15 way. We was going to start upstairs and come down  
16 this way. Those were the ones that were -- I had  
17 picked out that we would start working on.

18 Q Okay. And Mr. Parker performed that?

19 A Yes, he did.

20 Q And then you paid him for his labor?

21 A And I fired him for his labor as well.

22 Q Okay.

23 A Not fired him off the property but fired  
24 him from that job because it wasn't -- I'm -- was  
25 raised with four brothers. So I'm very smart when I

1 know you're trying to not do what I've asked you to  
2 do.

3 Q So with these three units that Mr. Parker  
4 was to repair or did repair, you felt he did not do  
5 an adequate job?

6 A He it did an excellent job on the first two  
7 but the third one he just wasn't -- he wasn't -- if  
8 I went -- I couldn't find him when he was supposed  
9 to be working on it. And it wasn't -- he wasn't  
10 getting it done fast enough.

11 So I just -- after that third room was  
12 finished, then we didn't do anymore. Plus, I was  
13 out of money paying him.

14 Q Okay. And when you say you were paying  
15 him, were you paying him out of funds from the  
16 Knights Inn?

17 A Yes.

18 Q And how much did you pay Mr. Parker to do  
19 those three rooms?

20 A I don't remember.

21 Q Okay. Was he being paid by the hour or for  
22 the job?

23 A Probably I would have paid him for the job  
24 since I was furnishing all the materials, the paint,  
25 the ceiling tiles, the carpet, and he had nothing to

1 do with the furniture and that came from the Knights  
2 Inn, the furniture did.

3 So I don't exactly -- I don't exactly  
4 remember. That was just something between me and  
5 him where I was trying to cut corners to get some of  
6 the rooms back together.

7 Q Would there have been -- was some  
8 documentation created that would indicate what  
9 Mr. Parker was supposed to do and how much he was  
10 going to be paid?

11 A I'm sure I documented it. Where it's at, I  
12 cannot tell you because I don't have access to  
13 anything that I had there.

14 Q Okay. Did you have a written agreement  
15 with Mr. Parker?

16 A Yes.

17 Q There was a written contract?

18 A Yes. Not a contract. It was just -- I  
19 agree to do this off hours, you know, and --

20 Q Where is a copy of this agreement? Was it  
21 put in a file?

22 A It would have been in my office in my  
23 employee -- where I kept notes on all the employees  
24 that worked there.

25 Q Would it have been in a separate file for

1 Mr. Parker specifically?

2 A No. It would have been in his file.

3 Q In Mr. Parker's file?

4 A Uh-huh.

5 Q That's a "yes"?

6 A Yes. Uh-huh. That means yes.

7 Q And it was just an agreement to say for him  
8 to do -- he was going to be paid "X" number of  
9 dollars per room. Is that the way it was?

10 A Yeah. I believe that's the way I set it up  
11 to try and get something started. I mean, I was  
12 trying to get -- I was just trying to get the hotel  
13 back up and running. I needed it desperately.

14 Q I understand.

15 A It put us in a financial bind.

16 Q Okay. Are the three rooms up on the second  
17 floor the only three rooms that Mr. Parker worked  
18 on?

19 A That is correct.

20 Q That is the only repair of fire damage --

21 A That is the only thing he did.

22 Q Who are Duncan Contractors? Have you ever  
23 heard that name?

24 A Yes. That's my friend out of Troy that  
25 said that the estimate would be entirely too

1 expensive for him -- too big of a deal for him to  
2 do. He was already obligated to other things  
3 locally.

4 Q Okay. And what is -- so it's Mr. Duncan.  
5 Is that your friend?

6 A It's -- yes.

7 Q Okay. Does he have a first name?

8 A Wayne.

9 Q Wayne. I like that name.

10 A He's still in business.

11 Q All right.

12 So did Wayne Duncan ever give you an  
13 estimate or he just said, "I can't do it. It's too  
14 big"?

15 A "I can't do it, Sheila. It's too much a --  
16 I don't want it to cost us our friendship. It's too  
17 big a job for me. I'm obligated here with my  
18 regular customers."

19 And he just didn't want to take it on. He  
20 didn't want to leave his family.

21 Q Understand.

22 Do you recall approximately when after the  
23 fire it was that Mr. Parker started the repair on  
24 the first of the three rooms that he worked on?

25 A Well, it was shortly after the fire

1 before the fire marshal shut me down because of the  
2 steel structure.

3 Q Any idea approximately when that was?

4 A Maybe -- it would have had to have been a  
5 week after that because after two weeks I believe is  
6 when the fire marshal come in and shut me down  
7 because of the steel structure.

8 Q So initially were you the designated  
9 contact person for the Knights Inn for the insurance  
10 company to deal with in terms of the fire damage  
11 claim?

12 A Up until Ms. V. took it over. I mean, that  
13 letter -- I guess she -- I'm sorry, I'm just still  
14 having trouble dealing with that letter that she  
15 said about me.

16 Q Did that letter upset you?

17 A Yes. That letter upset me.

18 Q You didn't know she felt that way about  
19 you?

20 A No, I didn't.

21 Q Okay.

22 A I mean, maybe that was her way around  
23 trying to smooth out everything. I did all I could  
24 do with the insurance company, and then that's when  
25 she felt like I wasn't getting anywhere, and she

1 didn't get anywhere either.

2 Q Have you seen any estimates of repair  
3 prepared by The Howard Group?

4 A I don't even know who they are. Anything  
5 that happened after I left -- and I left in April --  
6 anything that happened after that, I have no  
7 knowledge of it.

8 Q That took care of that, didn't it?  
9 Are you familiar with a company called  
10 Yellowhammer Roofing?

11 A No, I am not.

12 Q Have you ever had any dealings with  
13 Yellowhammer Roofing at the Knights Inn?

14 A No.

15 MR. TAYLOR: Gary, David, I think we've  
16 been going for quite some time. It's about 20  
17 minutes to noon. Do you want to take about another  
18 five-minute break?

19 MR. CONCHIN: Whatever. Whatever you all  
20 want to do. Whatever Ms. Allen wants to do.

21 Can you tell me, for planning purposes,  
22 Wayne, where you are in the -- as far as your  
23 pursuit?

24 MR. TAYLOR: Can we go off the record?

25 MR. CONCHIN: Yeah.

1 MR. TAYLOR: Go off record.

2 THE VIDEOGRAPHER: Okay. We're going off  
3 the record. This is the end of media unit four.  
4 The time is 11:40 a.m.

5 (Recess.)

6 THE VIDEOGRAPHER: We are going back on the  
7 record. This is the beginning of media unit five.  
8 The time is 11:52 a.m.

9 BY MR. TAYLOR:

10 Q Ms. Allen, before we took a break, you had  
11 mentioned that Ms. Visram had taken over handling of  
12 the fire claim. And I wanted to show you what has  
13 been marked as exhibit -- Defendant's Exhibit 88 --

14 A It's not another letter about me, is it?

15 Q -- for identification.

16 It's a letter from Zarin Visram to Brent  
17 Parrish dated February 9, 2015.

18 (Defendant's Exhibit 88 was marked  
19 for identification.)

20 BY MR. TAYLOR:

21 Q Have you ever seen this letter before?

22 A I haven't seen it, but that is what we had  
23 agreed upon, that she would take over.

24 But I didn't know I was just completely  
25 excluded from all of it.

1           Q    Okay. Well and in the letter, the second  
2 sentence Ms. Visram is telling Mr. Parrish (as  
3 read):

4                       "It is my instruction to  
5 you and to the insurance company  
6 that all communication, both written  
7 and oral, on the above-referenced  
8 claim be with me only."  
9 That's what that says; right?

10          A    Uh-huh.

11          Q    Is that a "yes"?

12          A    That is a yes.

13          Q    And then the next sentence says (as read):

14                       "No contact is to be made  
15 with, quote, on-site management,  
16 close quote, including contractors  
17 or anyone else regarding this  
18 claim."  
19 That's what it says; right?

20          A    Yeah. It definitely says that.

21          Q    Okay. And this took place -- this letter  
22 was sent in February of 2015, approximately three  
23 months before you left the Knights Inn; is that  
24 right?

25          A    I mean, we had agreed that -- I didn't know

1 all -- I didn't know all of this was going on  
2 between her and them. I mean, I feel like I've been  
3 slandered here.

4 She had agreed -- we had agreed that she  
5 would take over that because I just couldn't get --  
6 I couldn't get things going, and she was the owner.  
7 So...

8 Q Okay. So that was the reason -- this  
9 happened back in February of 2015, about three  
10 months before you left. Does that sound about  
11 right?

12 A I mean, I couldn't -- I just couldn't get  
13 anything done with the insurance company, and she  
14 agreed that she -- that she would just deal with  
15 him.

16 And I think he came to that conclusion,  
17 too, you know, that he would just deal with her  
18 instead of me.

19 Q Mr. Parrish you mean?

20 A Yes.

21 Q Okay. Do you recall Mr. Parrish requesting  
22 any documentation in connection with any contractors  
23 or individuals that were engaged to do repair work  
24 of the fire damages such as Mr. Parker or Duncan  
25 Contractors?

1 Do you recall --

2 A I couldn't provide him with any of that.  
3 Wayne wasn't interested. He didn't want to come up  
4 there and I didn't -- KW couldn't do -- you know, he  
5 wouldn't do all of them anyway. He couldn't do all  
6 of them.

7 So I never gave him back anything. I just  
8 let him and Ms. V. go on with it. Because there's  
9 nothing I could give him. The people I trusted to  
10 do it -- because I'm not from Birmingham.

11 Q So you just felt that you didn't have any  
12 documentation -- despite Mr. Parrish's request, you  
13 didn't have any documentation to give him about  
14 those repairs?

15 A Mrs. Visram was going to take care of that.  
16 I couldn't do it.

17 Q Got it. Thank you.

18 Gary, at this time I'm going to pass the  
19 witness subject to asking further questions,  
20 depending on what you ask her.

21 Thank you. Ms. Allen, thank you so much  
22 for your time.

23 A May I have a copy of that and the other  
24 letter that you showed me, please.

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EXAMINATION

BY MR. CONCHIN:

Q Ma'am, thank you for your patience.

Let me ask some questions here. Hopefully they'll help us understand what was going on when you were there, what you tried to do, what you knew, what you didn't know about.

And please clarify at the end of the deposition -- in case we show this to a jury in case you're not able to come back here for this trial, it will be tried in Birmingham, then I wanted the jury to get a clear picture, okay, of what your job was and how you saw it and what you did for us.

So please feel free, if I don't do a good job of asking you that, to -- to let me know that and then I'll provide you time to -- at the end -- to summarize your involvement.

So let me start off with this. If Chubb tries to paint a picture of this business that you worked so hard at for three years as dying before the fire, would that be true, please, ma'am?

MR. TAYLOR: Object to the form of the question.

MR. CONCHIN: You can answer.

MR. TAYLOR: Ma'am, just because I put an

1 objection on the record, you can still answer the  
2 question. We're just preserving this for the court.

3 THE DEPONENT: No. That hotel was  
4 operational. Both hotels were operational and  
5 revenue was good.

6 BY MR. CONCHIN:

7 Q And now if Chubb tries to paint a picture  
8 of that it was some rat hole, that it wasn't clean  
9 or doing a good job for the public, would that be  
10 true?

11 A Do I look like a person that --

12 MR. TAYLOR: Object to -- object the form  
13 of the question.

14 Go ahead.

15 THE DEPONENT: Do I look like a person that  
16 would live in a rat-infested hotel?

17 BY MR. CONCHIN:

18 Q No, ma'am, you don't. And that's why I ask  
19 you.

20 You lived there for three years, did you  
21 not, please, ma'am?

22 A Yes. And we did not have any rats or  
23 roaches or red -- bed bugs. We had an exterminator  
24 come from Montgomery every month to spray every  
25 room.

1           Q    You had motel experience even before this  
2 one year and then three years, you knew how to run a  
3 motel, did you not?

4           A    I knew exactly how to run a hotel and how  
5 to be a CRS person. I'm very good at that.

6           Q    And you had education in that regard about  
7 management, did you not?

8           A    Yes.

9           Q    You feel like you worked well with the  
10 hotel staff?

11          A    Absolutely.

12          Q    Do you feel like they were -- you mentioned  
13 all these folks that worked there, were they  
14 competent? Were they good?

15               And asked this way: If they were not, did  
16 you let them go?

17          A    Yes.

18          Q    And so you mentioned an inspection and I --  
19 let me ask you this. I think I know what you got  
20 reference to. I'm sorry, I'm not there to show you  
21 this document, but let me work through this and try  
22 to describe it.

23               I am looking at a document that is -- for  
24 reference purposes for the lawyers, it is Welborne  
25 1330 Bates stamped to 1351. It is a -- it is

1       entitled "WKFC Underwriting Managers Inspection Form  
2       for Chubb Custom Insurance Company" and tells the  
3       underwriter's name, and then it says, "Ordered by  
4       Ivy," and I'm not sure like Tech Shi, S-H-I. Then  
5       it says for Richmond & Associates, and then there's  
6       a lady name Jennifer Akler.

7               This is an inspection that was done, you  
8       mentioned, maybe two weeks before the fire. This --  
9       in fact, this inspection does say 3-12-2014 where  
10      they came in and inspected the motel and gave you a  
11      clear final.

12             Is that what you had reference to, please,  
13      ma'am?

14             A    Yes, sir, it is.

15             MR. TAYLOR:  Objection to the form of the  
16      question.

17             Go ahead.

18             THE DEPONENT:  Yes, sir, it is.

19      BY MR. CONCHIN:

20             Q    All right.

21             And that wasn't unusual, the insurance  
22      company, Chubb in this case, would have the property  
23      inspected from time to time. Is that fair?

24             A    Yes. We would have to have the property  
25      inspected or we could not get insurance with them if

1 it didn't pass.

2 Q Okay. This one says -- for example, I'm  
3 just going to look at a couple of things and ask you  
4 about it.

5 It says roofs are nine years old. It says  
6 the motel building has 80 units. And this is  
7 talking about building two, not the Studio.

8 It says the building motel has 80 units,  
9 housekeeping, laundry, self-service laundry. 50 of  
10 the 80 units are rentable, the other 30 are being  
11 renovated with new TVs, carpets, walls, tiles, and  
12 tubs.

13 Does that ring a bell?

14 MR. TAYLOR: Object to the form of the  
15 question.

16 You can answer.

17 THE DEPONENT: Yes. We did buy some new  
18 flat screens.

19 BY MR. CONCHIN:

20 Q Okay. And it says -- as far as  
21 percentages, percentage total area of vacant  
22 portion, and it says 31 percent, meaning 69 percent  
23 occupied.

24 Is that about fair, please, ma'am?

25 MR. TAYLOR: Object to the form of the

1 question.

2 BY MR. CONCHIN:

3 Q Less than two weeks before this fire?

4 MR. TAYLOR: Object to the form of the  
5 question.

6 MR. CONCHIN: Wayne, I'll give you a  
7 standing question to every question I got if you  
8 want it.

9 MR. TAYLOR: That won't be necessary, Gary.

10 MR. CONCHIN: Okay.

11 BY MR. CONCHIN:

12 Q So does that sound about fair, 69 percent  
13 occupancy before the fire?

14 A Yes.

15 MR. TAYLOR: Object to the form of the  
16 question. She's quicker than I am.

17 BY MR. CONCHIN:

18 Q Okay. It talks about storage. Mr. Taylor  
19 asked you about file storage. (As read):

20 "General manager said they  
21 would lease -- general manager says  
22 kitchen has been closed since 1998.  
23 Hotel files and storage are kept  
24 there."

25 Did you keep some files and storage in the

1 closed kitchen area or the closed bar/restaurant  
2 area?

3 A Kept them in the bar.

4 Q Okay.

5 A Not the kitchen.

6 Q Okay. It says the front desk is staffed  
7 24/7.

8 Did you staff the front desk 24/7?

9 A Absolutely.

10 Q It goes through -- and I'm talking about  
11 this, you know, two weeks before the fire here.  
12 Again, they go through and they look at the  
13 sidewalks; the security liability; air conditioning;  
14 parking lot; elevators -- well, emergency lighting,  
15 elevator not applicable; exit signs; clubhouse;  
16 fitness rooms; plumbing; electrical; carpentry;  
17 smoke detectors; illuminated signs; premises  
18 liability, potential issues; and bottom line, gave a  
19 clear final and said okay.

20 Do you remember that?

21 MR. TAYLOR: Object to the form of the  
22 question.

23 THE DEPONENT: I remember some of what the  
24 fire marshal, Michael Brannon, and I went over, but  
25 I can't say that all of that I remember.

1 BY MR. CONCHIN:

2 Q Okay. All right.

3 A I mean, that's a lot to take in.

4 Q Yes, ma'am.

5 And just to be clear, that was from the  
6 inspection report. The date of the survey, I said,  
7 was 3-12-14, and that was right before the fire, was  
8 it not?

9 A Yes. Because the fire was in March, and  
10 the inspection was in March.

11 Q Okay.

12 A With a man and a woman.

13 Q All right.

14 Now -- and in addition to you living there,  
15 you had family live there too, did you not, please,  
16 ma'am?

17 A My son did security. So he lived on the  
18 property.

19 Q All right.

20 Was it a good motel as far as you saw while  
21 you were there while you were helping operate the  
22 facility?

23 And I say "good" from a cleanliness and  
24 from a profit standards.

25 A I changed up a lot of things when I came in

1 to improve the profits of the hotel, the revenue.  
2 And I upgraded a lot of things and did a lot of  
3 things that the other general managers had not done.

4 One thing, making sure I did what the fire  
5 marshal said.

6 Q Okay. As far as when you left, were you  
7 okay with the repairs and things you'd done with the  
8 fire marshal, as far as your understanding?

9 A Yes. I'd done everything he asked me to  
10 do.

11 Q All right.

12 Now, you mentioned a while ago a guy that  
13 said there's a lot of smoke damage and you described  
14 him, dark, maybe dark brown hair.

15 Let me show you -- there was an adjuster  
16 named Wade Bushman who did appraisal work in this  
17 case. I'm going to show you a picture of him, and  
18 if Wayne can put it in front of you.

19 Did you ever see that guy out there, to  
20 your knowledge? Is this the guy you talked about  
21 that said that there was, quote, a lot of smoke  
22 damage, unquote?

23 A That does look like him.

24 Q All right.

25 And assuming he was one of the original

1 adjusters -- let me ask it this way.

2 Did one of those original adjusters on  
3 behalf of Chubb tell you that there was a lot of  
4 smoke damage?

5 MR. TAYLOR: Object to the form of the  
6 question.

7 BY MR. CONCHIN:

8 Q I believe you testified, when Mr. Taylor  
9 asked you, that one of the early Chubb people said,  
10 quote, there's a lot of smoke damage, unquote.

11 Is that your recollection?

12 A Yes. I think it was that person you just  
13 showed me. I think it was him that said that.

14 Q Okay. We have now learned that this was  
15 his very first appraisal adventure. I can represent  
16 that to you.

17 Did you know that this guy was working on  
18 this, this was his very first appraisal adventure  
19 that he was trying to do for the -- for the Knights  
20 Inn?

21 MR. TAYLOR: Object to the form of the  
22 question.

23 THE DEPONENT: I did not know that.

24 BY MR. CONCHIN:

25 Q Did he ever tell you -- he never told you

1       that?

2               A     No.   Not that I recall.

3               Q     Did he ever tell you he was buddies with,  
4     going to ball games, buddy-buddy with, Brent  
5     Parrish, the guy that you were having to deal with  
6     most of the time?

7               MR. TAYLOR:   Object to the form of the  
8     question.

9               THE DEPONENT:   Yes.

10              BY MR. CONCHIN:

11              Q     Did -- could you characterize your ability  
12     to communicate with Mr. Parrish.   Can you just  
13     describe that for us, please, ma'am.

14              A     I liked him a lot.   I really liked working  
15     with him.   But whoever was over his head calling the  
16     shots, he couldn't do nothing for me, you know.

17                     I mean -- and I just pressuring him and  
18     pressuring him, you know.   So we just agreed to let  
19     Ms. V. handle it from there on out because I could  
20     not get anything done.

21              Q     Okay.   Would it surprise you to know that  
22     Chubb is taking a position in this lawsuit that no  
23     one at Knights Inn, including you, ever gave them  
24     any information about loss of business and loss of  
25     revenue?

1           A    Yes.  I expressed that to Brent several  
2           times when the fire marshal shut me down.  I needed  
3           money to get -- I quote again -- the steel  
4           structures repaired.  And it cost me.  I had to have  
5           the hotel shut down.

6           Q    Well, did you know what a proof of loss  
7           form was?  I mean, did they ever come to you -- any  
8           of these Chubb folks, Brent or anybody -- and say,  
9           "Here's a proof of loss form I need you to sign to  
10          get some money"?

11          A    No.  No.  No.  I didn't have the authority  
12          to do that, but Brent did send me -- did me up a  
13          spreadsheet and he sent that to me for me to do the  
14          best I could do with the contents only.  He was  
15          trying to help the best he could.

16          Q    Okay.  Now -- and you don't know who was  
17          over him who had the money strings?

18          A    No.  I just know that I -- just that our  
19          hotel was getting shut down, and we did not have the  
20          funds from the insurance company to keep it open and  
21          get repairs done as needed.

22          Q    Now, did you agree with the fire marshal  
23          that the structure, the concrete part, the  
24          structural part in that area, was dangerous and it  
25          needed to be --

1           A    He -- he showed me how dangerous that it  
2   was.  So, therefore, I took steps to try to get it  
3   fixed, but I didn't move forward any, and so when  
4   the fire marshal came back out, he taped the hotel  
5   off and said nobody over there.  The employees had  
6   to move out from over there.

7           Q    And --

8                   MR. TAYLOR:  Are you talking about the  
9   Studio Inn, or are you --

10                  THE DEPONENT:  Yes.

11                  MR. TAYLOR:  Okay.

12                  THE DEPONENT:  The Studio Inn.

13                  MR. TAYLOR:  Thank you.

14   BY MR. CONCHIN:

15                  Q    Okay.  Just to explain.  At that time was  
16   everybody moved out of the Studio Inn?

17                  A    No.

18                  Q    Let me ask it this way.  Did you have --  
19   did anybody still have offices in or rooms that you  
20   all were trying to use in the Studio Inn?

21                  A    Just the employees were there and they --  
22   you know, I had to -- I had to move them over to  
23   that after the fire.  They stayed there for about a  
24   week, and then I had to make preparations for rooms  
25   to put them in.

1           Q    Okay. Now, just to explain to give us a  
2   visual here, the structural problems that they --  
3   that you and the fire department were concerned  
4   about, did that involve the section between the  
5   first and second floor?

6                   Did any of that involve the potential for  
7   the second floor to collapse?

8           A    It was the steel beams in the room and the  
9   room above it, and the steel beams on the outside,  
10   you know, like the railings that were made of steel  
11   on the outside.

12          Q    Yes, ma'am. Okay.

13                   Where the traffic flow would go?

14          A    Yes. And it -- he shut me down because I  
15   could not get that fixed.

16          Q    Okay. So back to this loss of income.

17                   If Chubb is taking the position that no  
18   claim was ever filed for business -- for what we  
19   call business interruption or loss of income -- and  
20   I'll represent to you that that is their position in  
21   this lawsuit -- did you provide any information that  
22   was requested about rooms or -- unused rooms, loss  
23   of income, to Mr. Parrish whatever he request- --

24          A    Yes, I did. Because I was concerned about  
25   the loss of income, but that just got overlooked and

1 we never -- we didn't discuss it, before I left,  
2 again.

3 Q Okay. Was it clear to anybody with a set  
4 of eyes to walk around that you had rooms that were  
5 not being rented because of the fire?

6 A Because of the fire, it really looked bad  
7 from the road. You understand?

8 I'm not going to rent too many rooms, you  
9 know, based on them unless they're regular  
10 customers. When they see that fire and police tape  
11 and all around it, it's going to be hard. It looked  
12 really bad from the road.

13 Q And did you explain that? Did you talk to  
14 Mr. Parrish about that?

15 A We talked so much, you know, I'm sure that  
16 I probably did. We talked so much. I don't know if  
17 that was -- I'm sure I probably mentioned that to  
18 him.

19 Q Did he ask you for any documents, anything  
20 in the nature saying, well, show me your lost rents.  
21 Give me an idea about how much rent you're losing,  
22 anything of that nature?

23 A Yes, he did.

24 Q All right. Did you -- did you ever deny  
25 him access to any information that he asked for,

1 please, ma'am?

2 A I just roughly like did an estimate,  
3 probably wasn't very accurate because I had so much  
4 going on with the rooms, and he was trying to get me  
5 something going on, you know, with the contents  
6 where I could -- we could start -- he was just as  
7 eager.

8 In all fairness, he was just as eager to  
9 help me get the hotel -- we had been talking so  
10 much, he was just as eager to help me get the hotel  
11 up and running again.

12 I mean, the documents that he -- that he  
13 wanted, I believe Ms. V. took care of that, if she  
14 took care of it. A lot of documents that he  
15 requested, if I didn't do it, it probably didn't get  
16 done.

17 Q If you would have had the money to fix  
18 everything that occurred from this fire -- let's  
19 talk about just the fire only.

20 If you would have had that money within 60  
21 to 90 days, could you have had this thing up and  
22 running and salvageable, please, ma'am?

23 A Sure.

24 Q Let's talk about the wind then -- claim  
25 then.

1                   We took -- you remember Mr. Bukhari, would  
2                   he be more familiar with the roof repairs and the  
3                   things going on with the roof and replacement of  
4                   ceiling tiles? Would he be more --

5                   A     Yeah. Because I had my hands full just  
6                   running the hotel with the front desk and all that.  
7                   I mean, I -- he was over maintenance and  
8                   housekeeping.

9                   Q     That's why I -- assuming that he testified  
10                  -- and his deposition was taken like yours -- and he  
11                  said close to the time of the fire, maybe a little  
12                  after, the windstorm was the very next month after  
13                  the fire. And he started seeing a larger amount of  
14                  leaks, and it was all he could do to replace the  
15                  ceiling tiles after that.

16                  Do you remember that?

17                  A     I --

18                  MR. TAYLOR: Object to the form of the  
19                  question.

20                  You can answer.

21                  THE DEPONENT: I remember telling him that  
22                  it was leaking in the office, you know. That -- as  
23                  far as what else he had going on, I know nothing  
24                  about that.

25                  ///

1 BY MR. CONCHIN:

2 Q He testified also that over the years there  
3 may have been a few leaks, but there was a -- after  
4 the tornado, he didn't really equate it to all the  
5 roofing leaks until later on.

6 So let me ask you this. Were you there,  
7 living there, when the tornado and the windstorm  
8 came through?

9 A Yes, I was. My son was spending the  
10 weekend with me.

11 Q Okay. Did you all -- did you sustain wind  
12 damage at the motel?

13 A All I know is it sounded like a freight  
14 train was coming through the hotel.

15 As far as busting any windows or coming  
16 through the hotel, it did not. But I do know,  
17 looking on the news, it got everything around us,  
18 the hospital, the apartments, the golf course --

19 Q All right.

20 A -- bushes and stuff.

21 Q Did anybody go -- did Brent Parrish or  
22 anybody from Chubb go up on that roof, to your  
23 knowledge, after the tornado -- after the windstorm,  
24 since they're out there anyway looking at the fire,  
25 did any of them go up there and come back and say,

1 "Ma'am, you got bad damage on the roof"?

2 MR. TAYLOR: Object to the form of the  
3 question.

4 THE DEPONENT: I did not -- I wasn't even  
5 aware they came out there. I was probably gone at  
6 that time.

7 BY MR. CONCHIN:

8 Q All right.

9 Did anybody from Chubb ever tell you that  
10 you had significant roof damage also?

11 A No.

12 Q Did you provide -- you and Mr. Bukhari --  
13 if anyone from Chubb wanted to get access to the  
14 roof or anything about the motel after the fire or  
15 after the windstorm, did you provide access?

16 A Well, if they needed to, yeah. I mean,  
17 sure, if they thought we had damage to the roof.

18 Q Would you have expected -- if Chubb  
19 representative saw wind damage to the roof, would  
20 you have expected them to report to you when you  
21 were the general manager?

22 A Yes.

23 Q Okay. Now -- okay. Let's talk about the  
24 fire.

25 Was there -- you may have already answered

1 this question already indirectly, but let me be more  
2 specific.

3 Was there a delay in paying for the fire  
4 damaged building from the fire of March 22nd, 2014?

5 A Yes. That was a problem that I couldn't  
6 resolve while I was there, and she took it over. I  
7 don't know the outcome of that. I'm going to assume  
8 that's why we're here.

9 Q All right.

10 Assume for me -- I'll represent to you it's  
11 true -- that the large -- larger fire damage  
12 check -- there was an initial amount paid, okay,  
13 close after the fire, but then the evaluation check  
14 on the fire was seven months later.

15 Was there some damage that occurred to the  
16 motel and to the motel business during that  
17 seven-month period of time, please, ma'am?

18 A Well, you got to remember, the fire  
19 happened in March, and I left in April. But we had  
20 fire damage, no doubt about it. And the hotel got  
21 shut down because of the fire damage.

22 Q I'm sorry.

23 A The hotel got shut down because of the fire  
24 damage while I was there.

25 Q It took till October of 2014 to pay the

1 lump sum on the fire damage. Was there -- was that  
2 too late, please, ma'am, to do any good with regard  
3 to fixing up the problems that you had by then?

4 MR. TAYLOR: Object to the form of the  
5 question.

6 THE DEPONENT: That would be the end of the  
7 hotel, period. That's my opinion.

8 BY MR. CONCHIN:

9 Q All right.

10 Did the delay damage your ability to make  
11 the repairs?

12 MR. TAYLOR: Object to the form of the  
13 question.

14 THE DEPONENT: I could not make any repairs  
15 with no money. These repairs were major.

16 BY MR. CONCHIN:

17 Q Did the delay damage Knights Inn's ability  
18 to keep business afloat?

19 MR. TAYLOR: Object to the form of the  
20 question.

21 THE DEPONENT: Could you repeat that  
22 question again.

23 BY MR. CONCHIN:

24 Q Yes, ma'am.

25 Did the delay in payment damage the Knights

1 Inn's ability to keep business afloat?

2 A It did.

3 Q Did the delay seem unreasonable to you as  
4 the general manager, as property manager?

5 MR. TAYLOR: Object to the form of the  
6 question.

7 THE DEPONENT: I've never heard of an  
8 insurance company taking that long to pay for  
9 something that's very visible.

10 BY MR. CONCHIN:

11 Q At some point did the delay appear to you  
12 to be intentional?

13 MR. TAYLOR: Object to the form of the  
14 question.

15 THE DEPONENT: I was there, sir, when the  
16 fire happened, but I only stayed a month after that.  
17 So I don't know what is going on after I left in  
18 April.

19 BY MR. CONCHIN:

20 Q All right.

21 I'm looking at a -- some notes about visits  
22 on the premises after the fire. So let me ask you  
23 about that.

24 In your opinion, should a safety fence have  
25 been put up to keep people out from the fire damaged

1 area?

2 MR. TAYLOR: Object to the form of the  
3 question.

4 Go ahead.

5 THE DEPONENT: Where you going to get the  
6 money to put it up at from?

7 BY MR. CONCHIN:

8 Q Well, that was going to be my question.

9 Your knowledge, did Chubb ever pay for  
10 putting a divider or a safety fencing up at least  
11 while you were there?

12 A No.

13 Q Did they ever pay for security or  
14 protection or did you all have to pay for your own?

15 A I have no knowledge of that.

16 Q Have you ever seen a -- ever see a new  
17 company, Security Engineers or Pinkerton or anybody  
18 else out there that Chubb paid for during this fire  
19 damaged area?

20 A No, sir.

21 Q Okay. By the time seven months had passed  
22 in the fire damaged building, did you start to have  
23 a mold or mildew or additional damage problem, in  
24 your opinion?

25 A Sir, that would normally be what happens if

1       you have a roof to leak, it is going to cause mold  
2       and mildew; but, again, I was not there seven months  
3       later. I left in April.

4             Q     Okay.

5             A     The health department will shut you down if  
6       you have mold and mildew in the rooms.

7             Q     As long as you were there, you were trying  
8       to fight this -- trying to fight them closing you  
9       all down, you were in compliance with everything  
10      requested of you, as far as you know?

11            A     Yes.

12            Q     Now, the wind damage claim, if the wind --  
13      if Chubb has determined, as others have, that the  
14      storm -- and I'm not trying to trick you, it's a  
15      storm date, okay, April 28th, 2014. Okay.

16                   Do you know the type of damage -- have you  
17      ever seen any charts or anything, the type of damage  
18      that was -- that was discovered on the roof after  
19      the windstorm?

20            A     Sir, I was not there to be aware of any of  
21      that. The fire happened in March. The tornado  
22      happened in April, and I left in April. The only  
23      thing I can tell you different was I had a leak in  
24      the office.

25            Q     All right.

1           A    Now, I don't know anything about a roof.

2           Q    And you didn't have that leak in the office  
3 before the storm, did you, please, ma'am?

4           A    No. That happened before I did leave. It  
5 was a leak in the office over the computer.

6           Q    Okay. And Mr. Bukhari, would he be the one  
7 that was trying to attend to that, please?

8           A    Yes. He or KW.

9           Q    When Chubb -- let me change forces here.  
10               When Chubb initially investigated,  
11 Mr. Parrish, out there, were all of your records  
12 available to look at that had anything to do with  
13 the business operation, as far as you know, please,  
14 ma'am?

15          A    Yes. My night audit gives everything.

16          Q    Now, at some point -- and I'm not sure  
17 when, I'm trying to describe it.

18               At some point the fire marshal had said get  
19 rid of some records, paper records. When was that  
20 in time?

21               If the fire occurred March 22nd, 2014 and  
22 the storm was April 28, 2014, can you put a time  
23 frame on that when the fire marshal had asked you to  
24 get rid of some paper records?

25          A    He has a copy of the letter when the fire

1 marshal came out there. And the letter that he sent  
2 me is when he told me, you know, get rid of all that  
3 records and stuff back there. Get rid -- it was  
4 boxed up -- things that were over five years old.  
5 They would have been -- they weren't of any use.

6 So we had to get rid of them, per the fire  
7 marshal. It was a fire hazard to have that many  
8 papers in one room.

9 Q All right. I understand that.

10 So for a period of time there night audit  
11 records, accounting-type information, sales  
12 receipts, all those kind of things, for a period of  
13 time they would be kept in the office in what we  
14 call the Studio building. Is that fair?

15 A Repeat the question. I'm not sure I  
16 quite --

17 Q So where records would go, generally, night  
18 audit records, rent, repairs, housekeeping, records  
19 like that, were they kept in the -- what we call the  
20 Studio building?

21 A Yes. After I filled up Yasif's office to  
22 the ceiling with what I had, the records. We had no  
23 other place to store them but the Studio Inn.

24 Q All right.

25 And that's the building -- is that the

1 building that caught fire?

2 A Yes, it is. But those papers there didn't  
3 have anything to do with the fire.

4 Q Okay. I understand. I understand.

5 But as far as access to your records and  
6 stuff, do you know if any of those records were  
7 burned or if the fire department water -- if any of  
8 those records were damaged?

9 A Not to my knowledge.

10 Q Okay. So for a period of time, they would  
11 have been available for a review by anybody wanting  
12 to look at them. Fair enough?

13 A Fair enough.

14 They would have most likely been in the  
15 office, up front in Yasif's office.

16 Q Okay. Did anybody with Chubb ever come to  
17 you and talk to you about a problem with smoke in  
18 the expansion joints? I'm using that language  
19 specifically.

20 A What is an expansion joint?

21 Q Smoke and soot.

22 A What is an expansion? What is an  
23 expansion?

24 Q Well, there's an issue here in this lawsuit  
25 about the dividers between rooms and about smoke

1 getting in there between that and going everywhere.

2 So I'm just asking -- you may not know  
3 anything about this. They might not have talked to  
4 you, but my question was did anybody from Chubb,  
5 Mr. Parrish or anybody else, ever come to you and  
6 talk to you specifically about smoke and soot issues  
7 in those expansion joints between the rooms?

8 A Not that I remember.

9 Q Okay. Fair enough. Okay.

10 How about this business location, ma'am?  
11 Was it a good business location?

12 A Yes.

13 Q Is it right across from the civic center?

14 A It is. And it was close -- right down at  
15 the red light was Walmart and the shopping center  
16 there and fast food places up the road.

17 So it was a real good location for  
18 truckers. Plenty of space for them to park and get  
19 fast food.

20 Q When you were there was this -- before the  
21 fire, was this a clean family-type atmosphere that  
22 you matter at that particular motel?

23 A I was the general manager. I made sure of  
24 that.

25 Q Occupancy rate good? You know, cleanliness

1 good?

2 A Yes.

3 MR. TAYLOR: Object to the form of the  
4 question.

5 MR. CONCHIN: Okay. Wayne, you objected to  
6 a compound question. So I'll stop, and I'll ask two  
7 questions.

8 BY MR. CONCHIN:

9 Q Was the occupancy rate good?

10 A Yes.

11 MR. TAYLOR: Object to the form of the  
12 question.

13 BY MR. CONCHIN:

14 Q Was the cleanliness good?

15 A Yes.

16 Q Now, you mentioned also housekeepers keep a  
17 list -- kept a list of any issues they wanted.  
18 Explain that, please, ma'am.

19 A Okay. Ask me the question again.

20 Q Yeah. Housekeepers, did they keep a list  
21 of anything that needed to be fixed or cleaned or  
22 special attention?

23 A Yes. They had a sheet attached to their  
24 housekeeping list that they would attach to it for  
25 maintenance, and I would turn it in to maintenance.

1 Q All right.

2 And did you -- was it part of your job to  
3 make sure that that got done?

4 A Yes.

5 Q We have seen some records in this case  
6 relating to curtains, okay, and being taken off,  
7 cleaned. That's the best way I know how to explain  
8 it.

9 Did you have any involvement in taking  
10 down, removal, sending out curtains for cleaning?

11 A Yes. Brent told me -- Brent Parrish told  
12 me to get all of the curtains and comforters and  
13 stuff that were salvageable and he would send  
14 someone out there. That he knew a company and he  
15 would send someone out there to pick them up.

16 However, I called him back a week later,  
17 and I had that done for them to come out there. I  
18 put all of the bad stuff that wasn't salvageable  
19 outside in garbage bags and left all of the -- and  
20 maintenance was going to put them in the garbage.  
21 And all of the good stuff that we could -- I felt  
22 like could be used with dry cleaning and so forth  
23 was inside the room for them to pick it up.

24 I did not know they were on the premises to  
25 pick them up. They, however, got the ones in the

1 room and the bags outside that were not cleanable,  
2 in error. They didn't -- they didn't talk to me,  
3 you know.

4 I had no knowledge that they were going  
5 to -- until everything was gone and they sent the  
6 bill, I just assumed that the housekeeper,  
7 maintenance, put the garbage bags that I had outside  
8 into the garbage where it was supposed to go.

9 I did not know, until we got a bill for  
10 \$13,000, they dry cleaned shower curtains. Now come  
11 on. Shower curtains? I mean, it was -- I could  
12 have bought all new stuff for what they charged me  
13 to dry clean all of that, and I never heard of dry  
14 cleaning curtains.

15 Q You never authorized it -- you never  
16 directed them to do that at all?

17 A I gave the okay with Brent for the company  
18 that he knew that he was going to send out there to  
19 pick it up. They never notified me exactly when  
20 they were coming. All I told him is I would have  
21 them bagged up and in a room.

22 And they just assumed that the bags outside  
23 was what they were to clean. They assumed. They  
24 did not even come into the office or talk to me.

25 Q Let me ask you about Ms. Visram's ability

1 to deal with this loss. Okay. Let me ask it this  
2 way.

3 Did you know her husband, please, ma'am?

4 A Yes, I did.

5 Q Would it be fair to state that he primarily  
6 ran the motel? He had more to do with running the  
7 motel than she did before his sickness?

8 A He had more knowledge than what she did.

9 Q And during his sickness, did she -- did she  
10 stay with him a lot and just --

11 A Pretty much -- pretty much the whole time,  
12 sir.

13 Q And did you take on that burden -- did you  
14 basically do both jobs?

15 A Yes.

16 Q Okay. And then after he passed, what would  
17 you -- how would you describe her ability to  
18 manage -- let me ask it this way. Being kind.

19 Did you have to really help her run the  
20 motel after he passed away? Did you have to spend  
21 more time helping run it?

22 A I totally ran the whole -- the whole hotel.  
23 Mr. V. done the driving. She is not capable of  
24 driving. So I had to drive her to every doctor's  
25 appointment, drive her to church or do everything.

1 It was like taking on two jobs but not getting paid  
2 any more money either.

3 I basically -- the hotel was in under my  
4 care 100 percent.

5 But that brings me to a question that I  
6 have for you, Mr. Conchin.

7 Q Yes.

8 A Okay. On September the 10th, 2015, are you  
9 aware of that letter that Mrs. Visram's -- Haman,  
10 dba Knights Inn, sent to Brent Parrish, are you  
11 aware of that letter that she sent to him about me?

12 Q I got that letter, and it looks to me like  
13 this is sent a year and a half after the fire, if  
14 it's the same letter. Yes, ma'am. I have it in  
15 front of me.

16 And so let me ask you this. A year and a  
17 half after the fire was -- were you pretty  
18 frustrated in addition to obviously she was  
19 frustrated?

20 MR. TAYLOR: Object to the form of the  
21 question.

22 THE DEPONENT: Yes. I was frustrated. She  
23 was frustrated. I can't make things happen. I  
24 can't do better with the hotel if we're losing  
25 business. It wasn't my fault. I didn't cause the

1 fire.

2 BY MR. CONCHIN:

3 Q Do you know -- is it your opinion that  
4 Chubb, when they started -- when they kept trying to  
5 deal with her directly, were trying to cut you out  
6 of this communication?

7 A I was aware of that. I mean, have a letter  
8 here where she says, basically, that I'm  
9 incompetent. Am I not correct?

10 Q Well, let's -- yes, ma'am, but let me move  
11 past that.

12 Were you aware that at one point she had  
13 requested Chubb to deal directly with The Howard  
14 Group, these individuals who had come down to try  
15 and make an assessment of the loss?

16 A I don't know about The Howard Group, and I  
17 don't know what she did after I -- Brent and I  
18 decided that he and her would work it out.

19 Q Did you know that repeated requests by The  
20 Howard Group that Chubb deal with them directly,  
21 that they refused to honor that and kept dealing  
22 with Ms. Visram?

23 MR. TAYLOR: Object to the form of the  
24 question.

25 THE DEPONENT: I wasn't aware of anything

1       that happened after April of 2015.

2       BY MR. CONCHIN:

3             Q     Did you have an understanding or feeling  
4       that this same thing was going on with you, they  
5       were trying to bypass you and deal with Ms. Visram?

6             MR. TAYLOR:   Object to the form of the  
7       question.

8             THE DEPONENT:   I think it was just as much  
9       her wanting to bypass me because there were too  
10      many -- "I'll call you back.   Let me get with her.  
11      I'll call you back," and too many things going on  
12      that I couldn't keep up with it.

13            It was probably better that she dealt  
14      directly with them because she had all of the  
15      authority.   She was the owner.

16      BY MR. CONCHIN:

17            Q     Okay.   So let me make sure of the timing.  
18      That's all I want to do, and then I think I'm  
19      cleared.

20            I thought that -- okay.   Let's go back to  
21      the fire, March 22nd, 2014.

22            And I was under the understanding you were  
23      there a long while after that trying to -- months  
24      after that trying to deal with the fire and the  
25      consequences of the fire and then that you -- and

1 along that same time, April 28th, 2014, the storm,  
2 you were there after that and that you worked  
3 through all these things till the end of that year  
4 and then you left April or so the next year.

5 Do I have my dates wrong?

6 A You have your dates wrong.

7 Q I'm sorry.

8 A The fire happened in March. The tornado  
9 happened in April, and I left in April -- the last  
10 day or the first day of May or whatever, but I left  
11 from there somewhere between -- pretty much at the  
12 end of April is what I want to say. So I have no  
13 knowledge of the roof.

14 Q Okay. But until you left, did you make  
15 yourself available to Mr. Parrish or anybody else  
16 that Chubb wanted to to access to ask questions  
17 until you left?

18 A Well, my thing is that I left in April of  
19 2015; correct?

20 Q '15.

21 A Okay.

22 Q '15.

23 A This is where --

24 Q That's where -- let me stop you there.

25 That's where I'm a little confused. I was

1 thinking you were there for months and months and  
2 months after the fire also.

3 A No. This letter is dated -- where she's  
4 wanting all contact to still be with her, I don't  
5 know why they would be trying to be contact me.  
6 This is in September and I left in April.

7 Q That's a year and half later after the fire  
8 when they're writing this letter -- when she's  
9 writing this letter.

10 Now -- so I'm trying to get the time frame  
11 right in my mind. Let me ask it this way. Were you  
12 there when the fire department came out and did an  
13 investigation after the fire?

14 A Yes.

15 Q Were you there when they ended up closing  
16 the motel down because the fire -- the fire area  
17 couldn't be fixed?

18 A Yes. Because of the structural damage.

19 Q Okay. Now, when did you -- when you left  
20 there -- and, again, this could be me just  
21 misunderstanding the dates, Ms. Allen. I'm trying  
22 to -- I wish -- I wasn't there.

23 This is first time you and I have met;  
24 correct?

25 A Correct.

1           Q    Bear with me. There was an estimate for --  
2   you got some folks in there, Brookstone was asked  
3   and they write a letter in June of 2014 where you  
4   asked them to just look at the structural issue.  
5   Okay. So that's like three months after the fire  
6   and you're still there then, are you not?

7           A    Hold on a minute, Mr. -- hold on.

8           MR. TAYLOR: Gary, I'm thinking she may  
9   need a break. I mean, you can see her.

10          THE DEPONENT: I do need a break.

11          MR. CONCHIN: Okay. All right.

12          THE VIDEOGRAPHER: Okay. We're going off  
13   the record. This is the end of media unit five.  
14   The time is 12:43 p.m.

15          (Recess.)

16          THE VIDEOGRAPHER: We are going back on  
17   record. This is the beginning of media unit six.  
18   The time is 12:49 p.m.

19   BY MR. CONCHIN:

20          Q    Okay. Ms. Allen, I was trying to get in my  
21   mind the time frame. And when Mr. Taylor started  
22   asking questions, I believe you told him that you  
23   left April of 2015. And that would have been --  
24   that seemed logical because you got this  
25   correspondence and meeting with -- where Brookstone

1 came out in June of 2014.

2 You got -- you were there a while and you  
3 saw KT or whatever his name was, KW, you directed  
4 him to do some work. There were -- you had your son  
5 doing security. You all had to move where you were  
6 operating out of the fire building to another  
7 building, moved the employees.

8 So I'm thinking all along that that took a  
9 year or so you were there and left in April of 2015,  
10 and I think that's what you answered to Mr. Taylor's  
11 question.

12 And I'm just making sure -- and I realize  
13 it's been a long process. Okay. And we may have  
14 mixed you up unintentionally. So --

15 A Okay.

16 Q I'm just trying to come back and make sure  
17 we're on the same page. So you're dealing with --  
18 you're dealing with Brent Parrish, all these things  
19 that occurred, and I'm thinking you left April of  
20 2015, but can you tell me, am I totally off base?

21 A We're not on the same page. So let me go  
22 back and look at the -- at this because I -- please  
23 bear with me and understand, talking about this  
24 hotel and bringing up the death of my son, that's  
25 just kind of breathtaking.

1           Q    I'm sorry.  It's been about six years, too,  
2           and I apologize.

3                   Do you remember when --

4           A    Listen, the fire happened in 2014, and I  
5           left in 2015.

6           Q    Yes, ma'am.

7           A    And I wouldn't have known that until I  
8           looked at this letter dated September so -- but that  
9           still doesn't change any -- that still doesn't  
10          change any of the questions you've asked.

11                   Mrs. Visram's took it over and left me out  
12          of it.

13          Q    Absolutely.  Okay.  And that doesn't change  
14          any of your testimony.  Your testimony has been  
15          truthful.  It doesn't change anything about the  
16          questions I've asked you.  Fair enough?

17          A    Fair enough.

18          Q    Okay.  I just -- I thought that was right  
19          and maybe some of these questions confused you and  
20          didn't mean to.

21                   So, now, if I understand it, you haven't  
22          been back to the premises, but you have seen the  
23          video of the of the condition of the premises now?

24          A    It's devastating.  I mean, it -- it really  
25          is.  I mean, my opinion is this is this woman's

1 career. She loves that hotel. After her husband  
2 died, that was her passion. And her daughter is  
3 Shazi Visram, and she told me -- she just told me  
4 she wanted her mother to keep running that hotel as  
5 long as she was able to, you know, and thanked me  
6 for the work I had done.

7 But to see it like this, it's over for her.  
8 She's -- that hotel is done with. It's over from  
9 your video.

10 Q Did you -- when you were with Ms. Visram,  
11 did you talk to her about her desire to keep it  
12 going because of her husband -- because of the  
13 length of time they had run it?

14 MR. TAYLOR: Object to the form of the  
15 question.

16 THE DEPONENT: The hotel was everything to  
17 her. That was her whole life, period. I mean, we  
18 would butt heads every now and then, but the hotel  
19 was up and running and my understanding, it just  
20 kept depreciating and depreciating until it's not --  
21 she's not going to ever to have enough money to  
22 build that hotel back again based on your video.

23 BY MR. CONCHIN:

24 Q Okay. Thank you, Ms. Allen. Thank you  
25 very much for your patience with us.

1 MR. TAYLOR: I've got just a couple more  
2 questions.

3 THE DEPONENT: Okay.

4 MR. TAYLOR: Hopefully we'll be done in  
5 five minutes. Okay?

6 THE DEPONENT: Okay.  
7

8 FURTHER EXAMINATION

9 BY MR. TAYLOR:

10 Q Do you remember when Mr. Conchin put on the  
11 screen the picture of Mr. Bushman that you said you  
12 think was the man that told you about the smoke  
13 damage?

14 A Yes. I mean, I wasn't 100 percent, but  
15 that looked like him. That was the description I  
16 gave and that was the picture he showed me.

17 Q You're not sure that it's him, but it could  
18 have been?

19 A I can't say that I'm 100 percent sure, but  
20 the reason I think it's him, because I thought he  
21 had such pretty white teeth, you know, and he was a  
22 clean-cut guy.

23 Q How long after the fire was it that you --  
24 that Mr. Bushman told you this? Or the person who  
25 told you about the smoke damage, how long after the

1 fire was that?

2 A I think they were on it pretty promptly.  
3 Around maybe May.

4 Q So somebody within two or three months of  
5 the fire?

6 A Yeah. They were work -- Brent was working  
7 on it and even -- Brent was working on it, and he  
8 even told me he would see about getting a partial  
9 payment out.

10 Q But I'm talking about Mr. Bushman, the  
11 person whose picture was put up there. How long --  
12 if that's the person that did it, how long after the  
13 fire was that?

14 A It could haven't more than two months. It  
15 was within a two-month frame.

16 Q Okay. Now, if I were to tell you that  
17 Mr. Bushman did not get involved in this claim until  
18 much, much longer than that, like nine months to a  
19 year after that, is it possible that then it was  
20 somebody else? That you're mistaken about who told  
21 you that?

22 MR. CONCHIN: Object to the form.

23 THE DEPONENT: He has a twin. I don't know  
24 but that kind of -- I gave a description of him, and  
25 he showed me the picture. So I just -- I could be

1 wrong. I'm not going to sit here and say, oh, no,  
2 no, no, that's him. No, I can't be sure.

3 BY MR. TAYLOR:

4 Q The questions that Mr. Conchin asked you  
5 about the business interruption loss, what  
6 documents, what financial records, of the hotel did  
7 you provide to Mr. Parrish?

8 A We wanted to figure out how much we were --  
9 we were having to go back through the night audits  
10 and look at what we were making versus what we  
11 weren't making. Would have been the night audits  
12 and -- I'm almost positive that I gave Brent -- you  
13 can just double ask him if I did not give him -- and  
14 it would have been on a fax form. I would have give  
15 him something showing that we were losing money by  
16 not renting that hotel.

17 Q And if Mr. Parrish were to say that he  
18 didn't get any documents relating to the night  
19 audits or any other financial documents in  
20 connection with the performance of the hotel, could  
21 you be mistaken?

22 A No. I would say he needs -- he needs to  
23 check it and make sure. Because I did everything  
24 that he was asking me to do.

25 Q I understand.

1                   If those documents are not in his file,  
2           could you be mistaken?

3           A     They would be in my files if they were  
4           there.

5           Q     I understand.

6                   Well -- and so if you had sent him a fax,  
7           there would be documentation indicating you sent him  
8           a fax; right?

9           A     Right.

10          Q     But -- so if -- maybe we can check those  
11         files, but we can also maybe check Mr. Parrish's  
12         files -- right? -- and see if he has them in there?

13          A     But I'm assuming that Mr. Parrish's -- once  
14         Ms. Visram took over, he could not have nothing else  
15         to do with me. Based on your letter that you showed  
16         me, he could not have nothing else to do with me.

17                   So, therefore, he might not have  
18         acknowledged what I had set up. He was going to let  
19         her do it.

20          Q     Okay. Can you -- and we can ask Ms. Visram  
21         these questions, too, but I need to know what  
22         documents you actually sent to -- give me a  
23         description or what it's called.

24          A     I sent a copy of those, the spreadsheets --  
25                 MR. CONCHIN: Object to the form. You keep

1 saying "sent." Her testimony is she provided access  
2 to it.

3 MR. TAYLOR: I don't think she said she  
4 provided access.

5 MR. CONCHIN: She sure did.

6 MR. TAYLOR: I think she said she provided  
7 -- well, no. You said -- you said could he have  
8 access. You didn't ask if she gave him access.

9 MR. CONCHIN: I did. I asked if she had  
10 ever prevented him from accessing anything and  
11 everything about it.

12 MR. TAYLOR: All right. Let's cover that.

13 MR. CONCHIN: So let's go ahead and go  
14 forward.

15 MR. TAYLOR: That's fine. Because I'd like  
16 for Ms. Allen to be able to leave here.

17 BY MR. TAYLOR:

18 Q Did you ever tell Mr. Parrish, in response  
19 to a request for documentation, that, hey, these are  
20 the documents over here. Come over here and look at  
21 them?

22 A I never met him in person. I don't believe  
23 he ever came on the property.

24 Q Mr. Parrish?

25 A Mr. Parrish. We talked on the phone. I

1 believe the whole time we talked over the phone.

2 Q So you never met him?

3 A Not to my knowledge.

4 Q Okay. Did you tell Mr. Parrish that any  
5 documentation he wants, he can come over and this is  
6 where they are? Did you ever tell him that?

7 A Not in those words. I said anything in the  
8 office you have access to.

9 Q Okay.

10 A And I would --

11 Q Did you ever send him any documents?

12 A I did send him those spreadsheets that you  
13 showed me.

14 Q A contents inventory sheet.

15 A Yes. Yes. And I sent him a loss of  
16 income -- proof of loss of income based on my night  
17 audits.

18 Q Okay. So you sent him a doc- -- you didn't  
19 send --

20 A I would have done it fax. I would not have  
21 done it by mail. I sent it per fax.

22 Q Okay. So you created a spreadsheet based  
23 on the night audits?

24 A I sent him going and showing what we were  
25 making every month versus zero income. That's what

1 I showed him.

2 Q Okay. So you sent him that. Did you ever  
3 send him any of the night audits?

4 A I sent him the last sheet of the night  
5 audit.

6 Q The back sheet?

7 A The back sheet, which is the total showing.  
8 That's all he needed to know. He didn't need any of  
9 the other.

10 Q Did you send him any other financial  
11 documents?

12 A I didn't -- I didn't have anything to send  
13 him. I mean, I didn't have anything to send him.

14 Q That's fair. Okay. That's fine.

15 With regard to the tornado that came  
16 through, the big -- there were two signs, there's  
17 like the big sign that's kind of high up, was that  
18 sign damaged during the tornado?

19 A I don't recall that being damaged.

20 Q Okay. And then there's another sign that's  
21 closer, kind of ground level?

22 A Ground level was damaged.

23 Q That sign was damaged --

24 A Yes.

25 Q -- as a result of the tornado? Okay.

1                   Were there any trees -- I guess the way  
2                   I've seen the property, the tree -- you've got the  
3                   road and then three sides of the property where the  
4                   hotel is located is surrounded by trees; right?

5                   Trees kind of line the property three  
6                   sides; right?

7                   A     Yeah. I think there was a lot of branches,  
8                   but I don't remember seeing any struck down because  
9                   that would have been something I would have had to  
10                  have a chainsaw and get -- my son was up there  
11                  visiting that weekend, he could have took care of  
12                  that. So I don't remember seeing any of that.

13                  Q     So you didn't have to hire any crews or  
14                  didn't have any crews that came out to the property  
15                  and removed any -- any broken trees or down trees or  
16                  broken branches as a result of that?

17                  A     Just a lot of debris.

18                  Q     Just blown debris?

19                  A     Debris.

20                  Q     What kind of debris?

21                  A     Well, I don't know if it was from our hotel  
22                  or somebody else's property, to be honest.

23                  Q     Okay. Fair enough.

24                             Let me check my notes a minute here.

25                             MR. CONCHIN: While we're waiting, Court

1 Reporter, Renee, I will send you -- I'm going to  
2 mark this picture of Mr. Bushman as Plaintiff's  
3 Exhibit 1, and I will send it to you by e-mail. The  
4 one we've been referring to a couple of times.

5 DEPOSITION REPORTER: Okay.

6 (Plaintiff's Exhibit 1 was marked  
7 for identification.)

8 BY MR. TAYLOR:

9 Q One last question. Were there any broken  
10 windows at the hotel --

11 A No.

12 Q -- as a result of the tornado?

13 A We didn't have -- we didn't have any broken  
14 windows not -- not on the front side, and I walked  
15 the property. I don't recall seeing any broken  
16 windows.

17 Q From the street level, did you see any  
18 damage to the roof?

19 A Like I said, I'm scared of heights. So I  
20 didn't get up there. This tornado came off -- the  
21 tornado came off the interstate. It sounded like --  
22 we had to get all -- everybody out and get them in  
23 what we thought was a safe room or put everybody in  
24 their bathtubs.

25 The way this tornado hit was it come off

1 the interstate, and when it hit, it did not come  
2 through our hotel like it should have. It came on  
3 top of the hotel and landed.

4 Q Went over it?

5 A Went over it like -- over the top of it.  
6 Now, I don't know if that done the roof damage, and  
7 then it landed back down and -- it's the strangest  
8 thing, and then it landed back down and hit the golf  
9 course right next to us, the hospital and an  
10 apartment complex. Except it went through the walls  
11 and all with them.

12 Q So when the tornado was near the property,  
13 it was over the property, not along the property?

14 A No. No. No. It wasn't high up over the  
15 property. We were lucky that we didn't -- it didn't  
16 take the building. It was just like -- probably the  
17 roof level, but I never -- I just never comprehended  
18 that it damaged the roof until he said something  
19 about it.

20 Q Today?

21 A Today. I never -- I just didn't -- I just  
22 didn't put that together with the roof, I guess.

23 Q Didn't know about any damage until  
24 Mr. Conchin said something today from the tornado?

25 A No. I mean, I knew that we had a leak in

1 the roof because -- we had a leak in the roof  
2 because it was over my computer.

3 Q But that was discovered two weeks before  
4 you left your employment -- right? -- in April of  
5 2015. Okay. Is that right?

6 A No. That would have been -- that would  
7 have been April 2014.

8 Q I thought you said you left your employment  
9 with Knights Inn in April 2015?

10 A I did.

11 Q Okay. And you said that you -- you  
12 discovered that leak was --

13 A The tornado did not happen until April 2014  
14 and the fire didn't happen until March 2014.

15 Q And then you left Knights Inn in April  
16 2015?

17 A Yes. That's what I just --

18 Q Your testimony -- your testimony earlier  
19 today was that you didn't have the leak in your  
20 office until two weeks before you left the Knights  
21 Inn, which would have been April 2015.

22 A It was -- it was before I left that we had  
23 the -- it was before I left that the leak was over  
24 my computer.

25 Q Right.

1           A    But these dates have kind of just gotten me  
2           confused based on the letter that you gave me dated  
3           on the 15th, and I'm wondering why would they still  
4           be talking to her on the 15th, because 2014 is when  
5           my son passed away.

6                        So that's a year I kind of just don't like  
7           to think about.

8                        Is that not right, Mr. Conchin? Is that  
9           what you said, 2000- -- you're the one that  
10          corrected me on the dates.

11          Q    He can't answer your question, ma'am.

12          A    Oh, okay.

13                       MR. CONCHIN: Yes, ma'am.

14                       THE DEPONENT: I'm talking about with the  
15          dates.

16                       MR. TAYLOR: I understand.

17                       THE DEPONENT: Based on the letter you gave  
18          me based on what he was saying because he --

19          BY MR. TAYLOR:

20          Q    So the first time you heard of any roof  
21          damage as possibly being connected to the tornado  
22          was today when Mr. Conchin was asking you questions;  
23          is that right?

24          A    No. It was before I had -- before I had  
25          left. I didn't have any -- I didn't have anything

1 to do with the roof. Yasif was over the roof.

2 Anything to do with --

3 Q Right. I'm saying the first time you knew  
4 that there might be any issues with the roof --

5 A The first time --

6 Q -- was today?

7 A The first time that I had an issue with the  
8 roof is before I left. It was leaking over my  
9 computer.

10 Q About two weeks before you left the Knights  
11 Inn?

12 A Yes.

13 Q Okay.

14 A Now, Yasif and Ms. Visram and Brent Parrish  
15 would have been taking care of the roof.

16 Q Very good. Well, thank you very much for  
17 your time.

18 Gary, anything else?

19 MR. CONCHIN: Ma'am, thank you for your  
20 patience.

21 MR. TAYLOR: Thank you very much for your  
22 time.

23 MR. CONCHIN: Ms. Allen, thank you very  
24 much.

25 MR. TAYLOR: Oh, wait a minute. Hang on.

1 Hang on. Hang on.

2 Ms. Allen, you have the right -- and I  
3 can't advise you and Mr. Conchin can't advise you,  
4 but you have the right to review your transcript,  
5 make sure there are no inaccuracies in your  
6 testimony.

7 And the court reporter would explain all  
8 that to you, or you can waive that right.

9 We can't tell you one way or the other, but  
10 we do have to at least let you know you have the  
11 right to review your transcript and then sign --  
12 note any corrections, and sign the transcript in  
13 front a notary --

14 THE DEPONENT: So it's like to read over  
15 everything we've been over, but not a printed out  
16 thing?

17 MR. TAYLOR: Well, it would be printed out  
18 probably for you to do, or you can say I don't want  
19 to do that. But that's up to you. I can't advise  
20 you one way or the other.

21 THE DEPONENT: I can take -- if you can  
22 print it out, I will take a copy of it.

23 MR. TAYLOR: The court reporter here,  
24 Renee, is who -- or somebody from her office will  
25 probably be in touch with you.

1           Mr. Conchin and I will not be involved in  
2           that aspect of it.

3           THE DEPONENT:   Okay.

4           MR. TAYLOR:    Okay?

5           THE DEPONENT:   Okay.

6           MR. TAYLOR:    Great.   Thank you very much  
7           for your time.

8           MR. CONCHIN:   Renee, I would like a travel  
9           transcript and an electronic and then a copy of all  
10          the exhibits, of course, with the travel transcript.

11          THE VIDEOGRAPHER:  All right.  We're going  
12          off the record at 1:08 p.m., and this concludes  
13          today's testimony given by Sheila Allen.

14          The total number of media used was six and  
15          will be retained by Veritext Legal Solutions.

16          (Whereupon the deposition was  
17          concluded at 1:08 p.m.)

18          ///

19          ///

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7  
8 I, SHEILA ALLEN, do hereby declare under  
9 penalty of perjury that I have read the foregoing  
10 transcript; that I have made any corrections as  
11 appear noted, in ink, initialed by me, or attached  
12 hereto; that my testimony as contained herein, as  
13 corrected, is true and correct.

14 EXECUTED this \_\_\_\_ day of \_\_\_\_\_,  
15 \_\_\_\_\_, at \_\_\_\_\_, \_\_\_\_\_.  
(City) (State)

16  
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19 \_\_\_\_\_  
SHEILA ALLEN  
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25

1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, Registered  
3 Professional Reporter, Certified Live Note Reporter,  
4 do hereby certify:

5 That the foregoing proceedings were taken  
6 before me at the time and place herein set forth;  
7 that any witnesses in the foregoing proceedings,  
8 prior to testifying, were duly sworn; that a record  
9 of the proceedings was made by me using machine  
10 shorthand which was thereafter transcribed under my  
11 direction; that the foregoing transcript is a true  
12 record of the testimony given.

13 Further, that if the foregoing pertains to  
14 the original transcript of a deposition in a Federal  
15 Case, before completion of the proceedings, review  
16 of the transcript [ x ] was [ ] was not requested.  
17 I further certify I am neither financially  
18 interested in the action nor a relative or employee  
19 of any attorney or party to this action.

20 IN WITNESS WHEREOF, I have this date  
21 subscribed my name.

22 Dated: March 20, 2020

23 

24 RENEE A. PACHECO

25 CSR No. 11564 RPR, CLR

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1 Sheila Allen

2 470 Jackson Street, Colton, CA 92324

3 March 20, 2020

4 RE: Haman Inc. v. Chubb Custom Insurance Company

5 3/2/2020, Sheila Allen (#3980452)

6 The above-referenced transcript is available for  
7 review.

8 Within the applicable timeframe, the witness should  
9 read the testimony to verify its accuracy. If there are  
10 any changes, the witness should note those with the  
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of  
13 Deponent and Errata and return to:

14  
15 erratas-cs@veritext.com  
16

17 Return completed errata within 30 days from  
18 receipt of testimony.

19 If the witness fails to do so within the time  
20 allotted, the transcript may be used as if signed.

21  
22 Yours,

23 Veritext Legal Solutions  
24  
25

Haman Inc. v. Chubb Custom Insurance Company

Sheila Allen (#3980452)

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\_\_\_\_\_

Sheila Allen

Date

1 Haman Inc. v. Chubb Custom Insurance Company

2 Sheila Allen (#3980452)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Sheila Allen, do hereby declare that I  
5 have read the foregoing transcript, I have made any  
6 corrections, additions, or changes I deemed necessary as  
7 noted above to be appended hereto, and that the same is  
8 a true, correct and complete transcript of the testimony  
9 given by me.

10  
11 \_\_\_\_\_  
12 Sheila Allen

\_\_\_\_\_ Date

13 \*If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 \_\_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_\_\_.

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18 \_\_\_\_\_  
19 NOTARY PUBLIC  
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Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1,

2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

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